Member of the public 2002

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant planning, environmental, cultural, and procedural deficiencies.

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, introduces significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle is warranted.

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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly deficient, lacking the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This absence creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified through the

developer's research.

Summaries available indicate that residents are currently experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are thus not speculative in nature. Nonetheless, the failure to disclose the complete assessment prevents thorough scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Evidence suggests that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” being highlighted in the developer's own findings. Despite this acknowledgement, the impacts have not been adequately incorporated into the main application nor assigned appropriate weight in the decision-making process. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where the character and functioning of the community may be at stake. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance of benefits against harm.

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

The procedural implications of these deficiencies are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment regime.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is fundamentally lacking and fails to deliver the necessary detail for a proper evaluation of potential environmental effects. The proposal entails significant seabed preparation and installation work in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention

Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent is granted, which obstructs any meaningful assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises serious concerns due to the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application acknowledges the risks of sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on strategies for prevention, control, or monitoring of these events.

There is also ambiguity regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without comprehensive modelling and explicitly 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 recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the assessment of whether adequate safeguards are in place to address pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to evaluate environmental protection measures at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation measures must be assessed before consent is granted, and without this crucial information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy obligations 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 deficiencies obstruct a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents a significant inadequacy in meeting the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable extent of industrialisation was highlighted. This current proposal, however, is put forward within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community

wellbeing.

Moreover, the application lacks a comprehensive and reliable evidential basis essential for determination. There are substantial gaps in baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, critical impact pathways concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to include a compliant Island Communities Impact Assessment is a breach of duty under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment represents a significant omission. These issues obstruct the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In terms of alignment with National Planning Framework 4, the proposal is at odds with its requirements. It does not demonstrate adequate protection of biodiversity, natural areas, and cultural heritage. Furthermore, it has not substantiated that health and wellbeing impacts are acceptable, nor has it provided evidence of net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has been insufficient, obscuring crucial effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain ambiguous and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination of acceptable impacts.

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

In light of these factors, the application is both procedurally and substantively unfit for determination. The breadth of informational deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the requisite missing information.

Thus, 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 is a very scary development that is going to ruin our special community!
The marine wildlife is going to be destroyed , our health will suffer! This is a tragedy

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: B742B437

Member of the public 2003

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. The flexible Project Design Envelope lacks commitment to specific dimensions, layouts, or configurations for turbines, introducing considerable uncertainty. This ambiguity hinders the assessment's integrity and means that the reported impacts may not accurately reflect the actual development, thereby limiting both public understanding and the competent authority's ability to gauge the full extent of environmental effects.

Consent is being sought based on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach implies that environmental harm will be addressed post-consent, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of critical information to later stages is procedurally unacceptable and undermines the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before any determination is made.

The application also suffers from considerable evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty regarding the magnitude and significance of the impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hampers the understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is at odds with statutory requirements.

As a result, the application does not satisfy the evidential threshold under the Habitats Regulations required to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been fully assessed or that appropriate safeguards exist.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation strategies, and the presence of gaps in baseline data contribute to making the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information available.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the application related to the West Lewis coastline is fundamentally flawed as it overlooks the area's status as a living cultural landscape, where the environment, language, tradition, and community are deeply interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, treating heritage as a collection of isolated

and static assets.

A significant shortcoming is evident in the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are mischaracterised as static features in the assessment. This failure to consider their continued use and meaning, as well as the implications of development on their setting, results in an incomplete evaluation of cultural impacts and disregards their importance within community life.

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are crucial to the area's identity but are not acknowledged, representing a significant oversight. The lack of consideration for these factors hinders a proper understanding of the cultural impact of the proposed development.

Concerns also arise regarding the rights of the community and the lack of engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This absence of meaningful engagement raises questions about the legitimacy of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A further critical issue is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The omission of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thereby obstructing a lawful determination of the application.

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

In conclusion, the shortcomings in assessing living heritage, intangible cultural value, community rights, and compliance with statutory obligations create a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not provide a solid foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal is severely lacking in its assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the complete report has not been published. This creates a significant evidential gap, preventing both the public and the competent authority from fully understanding the social risks highlighted in the developer’s

research.

Summaries suggest that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement rather than speculation. However, without access to the full assessment, proper scrutiny of the findings is impossible, limiting the ability to evaluate their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” identified in the developer’s findings. Yet, these impacts have not been adequately incorporated into the main application or given the necessary weight. By withholding the complete Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

The lack of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset results in an incomplete evidential basis for evaluating the balance of benefits and harm.

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

The procedural consequences are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission within the application and fails to meet the evidential requirements of the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This impedes a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

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 for construction within the high-energy Atlantic environment along the West Lewis coastline raises significant concerns regarding its environmental assessment. The application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, instead deferring important mitigation and contingency measures to a post-consent stage. This reliance on undefined future measures hinders a proper evaluation of their adequacy and effectiveness, especially given the sensitivity of the receiving environment.

The coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these risks. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation, which complicates the determination of the extent, duration, or ecological effects of these impacts. This uncertainty is particularly pertinent for marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By leaving contingency planning for after consent, the application raises procedural risks and undermines the competent authority's ability to assess the necessary environmental protection measures during the decision-making process. From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation must be assessed prior to granting consent. Without this information, a lawful determination cannot be achieved, and the application does not demonstrate compliance with the relevant policy requirements for environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts create a materially deficient assessment of construction and pollution risks. These shortcomings further support the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with sustainable development requirements as mandated by statutory duties and national policy. It echoes the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, this application is set against a more rigorous policy framework that emphasises the importance of biodiversity, the protection of peatlands, the integrity of landscapes, and the wellbeing of communities.

A critical examination reveals that the proposal lacks a complete and reliable evidential foundation necessary for determination. Notable gaps exist in baseline data, with the application relying on an undefined design envelope and unspecified mitigation

measures. Additionally, crucial impact pathways have been overlooked, including effects on nocturnal wildlife, the full spectrum of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment fails to adequately address likely significant effects or residual impacts.

Moreover, the application demonstrates procedural shortcomings. The absence of a compliant Island Communities Impact Assessment signifies a breach of statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment results in a material omission. These shortcomings inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, nor does it substantiate acceptable impacts on health and wellbeing. Furthermore, the absence of tourism impact modelling fails to demonstrate a net economic benefit. The cumulative effects of offshore and onshore components have not been thoroughly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and hindering a lawful determination of acceptable impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The array of information deficiencies, alongside policy inconsistencies and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or exercise the relevant regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B824537C

Member of the public 2004

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It is essential to highlight that the development's location off the west side of the Isle of Lewis is significant, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which question its compatibility with statutory requirements and national policy, as well as the principles of sustainable development.

The application presents substantial deficiencies, particularly regarding its evidential basis. A critical analysis reveals that significant environmental data is missing, while baseline information is both limited and inconsistent. Key aspects of the proposal remain undefined, and the use of a flexible design framework hampers a clear understanding of potential significant effects. Furthermore, reliance on unspecified mitigation measures raises doubts about their effectiveness. Consequently, the documentation falls short of providing a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly pronounced concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical, directly affecting the statutory tests necessary for consent and undermining the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises further concerns, with large turbines planned in close proximity to the shoreline. This positioning introduces significant issues related to landscape capacity, visual dominance, and environmental impact. Taken together, the insufficiencies in information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these considerations, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary robustness and fails to deliver a full, transparent, or reliable analysis of the potential environmental effects

of the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and inhibits a consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts reported may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental consequences.

Consent for the application is sought based on mitigation measures, monitoring strategies, and management plans that are not yet defined. This reliance on unspecified strategies means that any environmental harm is to be addressed at a later stage, thus preventing a meaningful evaluation of their effectiveness or a proper assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and directly contradicts the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to any determination.

Moreover, there are significant 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 the impacts, particularly where conclusions of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient 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 meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle is engaged, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, failing to ensure that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

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 thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The deficiencies in the assessment of marine ecology and protected species are significant and compromise the understanding of ecological receptors within the West Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the baseline data provided is incomplete. The methodologies employed fail to capture essential information regarding species presence, behaviour, and habitat use, which undermines the evidential basis required for assessing potential impacts.

One major concern is the omission regarding otters, a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. This oversight extends to the core foraging range and behavioural patterns of otters, which have not been sufficiently evaluated in terms of the potential impacts arising from construction disturbances, noise, and increased human activity. Consequently, any conclusions drawn about the absence of significant effects on this species are fundamentally flawed.

Additionally, the assessment of basking sharks contains considerable deficiencies, particularly due to the reliance on aerial surveys that introduce substantial detection bias, especially in the challenging conditions of the Atlantic. Such an approach is likely to underestimate their presence, particularly in light of established land-based observations that indicate frequent usage of these waters. The failure to incorporate this crucial data further weakens the reliability of the baseline and the overall conclusions presented.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application significantly fails to meet the evidential standards necessary to demonstrate that there will be no adverse effects on the integrity of protected sites, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis. This region is known for its significant seabird populations, many of which are already in decline. The proposed development is situated within key foraging areas and migratory pathways, yet the assessment lacks a thorough evaluation of critical factors such as displacement, collision risk, and habitat loss.

There is a fundamental contradiction within the application, as the developer

concludes there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. The assessment does not convincingly prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. Moreover, it fails to fully account for the importance of these vital feeding grounds, and its reliance on modelling approaches adds further uncertainty, particularly for species in steep decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding regarding behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional and significant risk, as it creates a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term effects of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to assert no adverse effects on protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling limitations, means that it has not reached the standard of proof beyond reasonable scientific doubt. This situation invokes the precautionary principle, which obstructs a lawful conclusion in support of consent.

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

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a robust evaluation of potential impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity in the application is fundamentally inadequate, disregarding the West Lewis coastline as a dynamic cultural landscape where community, tradition, environment, and language are deeply interconnected. The application treats heritage as isolated, unchanging assets, failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

A major flaw is evident in the handling of culturally significant locations, particularly the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and spiritual practices. The assessment mischaracterises these spaces as static, ignoring

their continued use and the implications of development on their surroundings. This oversight results in an incomplete understanding of cultural impacts and neglects their essential role in community life.

Moreover, the assessment fails to consider intangible cultural heritage elements, such as the Gaelic language, traditions, and the enduring connection between the community and its coastal environment. These factors are crucial to the area's identity yet are notably absent from the evaluation, which constitutes a significant oversight. The cultural implications of the proposed development cannot be adequately understood without addressing these components.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community, recognised as having distinct characteristics of an Indigenous People, has not been involved in a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and does not align with established principles of participation regarding cultural and environmental matters.

Another critical issue is the failure to conduct a compliant Island Communities Impact Assessment, a statutory requirement outlined in the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, signifies a clear deviation from required policies.

In sum, the collective failures to assess living heritage, intangible cultural values, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently evaluated, resulting in an application that does not adequately address the true cultural costs involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed development is severely lacking and does not sufficiently acknowledge the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The addition of large-scale turbines near the shoreline would create a consistent and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that cannot be reversed.

Moreover, the application fails to accurately depict the magnitude of the visual change. The size and proximity of the turbines would dominate the views from residential areas,

historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining qualities of naturalness and remoteness. This level of impact and its significance in such a sensitive landscape has not been properly conveyed in the assessment.

Concerns also arise regarding the selection and representation of visual viewpoints within the methodology. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the assessment's reliability.

Another critical shortcoming is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these sites as isolated entities, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural areas and historical assets. The level of change proposed is incompatible with the mandate to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy compliance.

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

Overall, the assessment inadequately represents the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is not compatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The proposal presents serious deficiencies in the assessment of fisheries and marine life, failing to deliver a comprehensive evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a rich marine ecosystem and a vibrant fishing industry, yet the application does not provide assurance that these essential uses and habitats can be preserved or sustained

without considerable disruption.

A critical flaw lies in the presumption that fishing activities can be relocated without consequences. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or suitable for increased pressure. This gap is significant because displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and local livelihoods remain unclear.

The risks posed to marine species are also considerable, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period threatens to disturb a wide range of species, notably dolphins. The forecasted disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays the importance of these potential effects, lacking adequate supporting evidence.

Furthermore, the application reveals an inconsistency in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising such impacts as negligible. This contradiction weakens the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

The assessment fails to address cumulative impacts from various pressures, including 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 does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, hindering any assertion that the proposal constitutes sustainable development.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies render the assessment inadequate and untrustworthy. These shortcomings obstruct a thorough evaluation of the repercussions on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the criteria for sustainable development when measured against statutory duties and national policy. It echoes the critical issues that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was established. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community

wellbeing, the application presents serious deficiencies.

There are significant gaps in the evidential basis required for determining the proposal. The use of an undefined design envelope, reliance on unspecified mitigation measures, and crucial omissions in baseline data regarding nocturnal wildlife, full onshore infrastructure, and tourism impacts leave the Environmental Impact Assessment incomplete. This incompleteness hinders a comprehensive understanding of the likely significant effects or residual impacts that may arise from the project.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the statutory obligations outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Additionally, there is no assurance that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of a net economic benefit. The failure to adequately assess the cumulative effects of both offshore and onshore elements obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist due to incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing any lawful determination that impacts would be acceptable.

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

In summary, the application is fundamentally flawed both procedurally and substantively. The overwhelming scale of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is essential that the competent authority either refuse consent based on these grounds or invoke the appropriate regulatory measures to ensure that the missing information is submitted.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: DC9F62C8

Member of the public 2005

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the requirements set out by the Environmental Impact Assessment regime. It does not provide a clear comparison of realistic alternatives based on their environmental effects. Instead, the application offers a narrative of project development, which does not effectively show that less harmful options have been identified, assessed, and chosen over more damaging solutions.

There is no clear, evidence-based analysis of alternative offshore locations, development scales, or design options. Specifically, the application does not indicate that the developer has genuinely considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts could be reduced. The West Lewis coastline is particularly sensitive, and proximity to shore is crucial in assessing impacts. Thus, the lack of this analysis means that it cannot be concluded that the proposed siting is the least damaging option available.

The shortcomings also apply to cable routing and landfall evaluation. There is inadequate evidence that alternative routes have been thoroughly examined to prevent or lessen impacts on sensitive receptors, including culturally significant sites like Barvas Cemetery. The absence of a clear strategy to avoid these impacts, along with a lack of comparative analysis, suggests that mitigation through design has not been implemented, relying instead on mitigation measures after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This oversight constitutes a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine if less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to assert that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of assessment compromises adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative analysis is a significant omission, leading to the conclusion that the application has not been properly evaluated and cannot be lawfully determined.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is fundamentally flawed, characterised by internal inconsistencies and significant gaps in evidence that compromise its validity. The Isle of Lewis, particularly along its west coast, is home to internationally important seabird populations that are already experiencing declines. The application does not adequately demonstrate, to the necessary evidential standard, that these species will remain unaffected. Key foraging areas and migratory pathways are impacted by the proposed development; however, the assessment fails to sufficiently evaluate the risks of displacement, collision, or habitat loss associated with this siting.

A critical contradiction arises within the application, as the developer claims no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only relevant when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions are not substantiated by the available evidence. Furthermore, the application lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The

significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate potential mortality, especially given the incomplete baseline data and the inadequate understanding of behavioural responses.

The positioning of turbines within a known migratory corridor significantly heightens risk, 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 implications 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 fulfil the evidential criteria necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, which ultimately prevents a lawful conclusion that would support consent.

The identified deficiencies also signal non-compliance with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Overall, the assessment is rendered unreliable due to its internal contradictions, methodological inadequacies, and lack of robust evidence, which collectively prevent a comprehensive evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is fundamentally lacking, failing to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community interweave. Instead, the application employs a simplified approach, treating heritage as isolated, static entities rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the consideration of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites; however, the assessment classifies them as mere static features. This oversight neglects their continued use and significance, as well as the impact that development would have on their setting. Consequently, this misrepresentation leads to an incomplete understanding of cultural effects and ignores their integral role in community life.

The assessment further overlooks intangible cultural heritage, which encompasses the

Gaelic language, local traditions, and the long-established bond between the community and the coastal environment. These elements are vital to the identity of the region but are conspicuously missing from the evaluation, signifying a major gap in understanding the true cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community embodies a distinct cultural identity, recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement casts doubt on the legitimacy of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

Moreover, there is a critical procedural failure in the absence of a compliant Island Communities Impact Assessment, which is a legal requirement under the Islands (Scotland) Act 2018. This omission precludes the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, thus impeding a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory responsibilities creates a substantial evidential gap. The cultural impacts of the development remain inadequately examined, and the application fails to furnish a solid foundation for understanding the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. This would create a continuous and dominant industrial presence, fundamentally altering the landscape and resulting in a permanent and irreversible transformation of the area.

The application's assessment of seascape, landscape, and visual impacts is deficient. It does not adequately convey the magnitude of the visual change that would occur. The scale and proximity of the turbines mean that they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the key qualities of naturalness and remoteness. Moreover, the assessment fails to properly represent this level of impact or its significance in the context of a sensitive landscape.

There are serious methodological concerns regarding how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not fully reflect

the most sensitive receptors or worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This raises the risk that the assessment has understated the magnitude of visual impact, undermining its reliability.

Additionally, the assessment fails to consider the interconnected relationship between landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape setting tied together by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets rather than recognising their interdependence results in an incomplete evaluation of their cultural significance and the impacts on their setting.

The industrialisation of the seascape would sever these relationships, fundamentally altering how heritage assets are experienced and disrupting their connection to the natural horizon. This represents not only a visual impact but also 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 concerning the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment significantly undermines any claim of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Consequently, the change is fundamental and permanent and cannot be reduced to an acceptable level through mitigation.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fundamentally alters the night-time environment along the West Lewis coastline, introducing permanent red aviation lighting that creates a continuous and intrusive “wall of light” effect across the western horizon. This significant change not only impacts visual amenity but also poses a severe risk to the area’s cultural identity and tourism value, particularly in light of the emerging astro-tourism sector, which thrives on the exceptionally dark skies that characterise this region. The application fails to assess how this new lighting affects landscape character or the experience of both residents and visitors, leaving a critical gap in the environmental assessment.

Moreover, the absence of an evaluation concerning the impacts on nocturnal wildlife is

alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting due to phototaxis. The proposal neglects to include any form of lighting impact assessment or phototaxis study, thus failing to evaluate how the aviation lighting might increase the risk of disorientation and collision for these species. This omission is further exacerbated by a reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from such lighting, yet this risk has not been addressed.

The lack of site-specific night-time data creates an essential void in understanding the ecological impacts, preventing a determination of whether protected species or designated sites could be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt remains unmet, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this glaring omission contradicts the National Planning Framework 4, which underscores the importance of protecting natural places and ensuring environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an integral component of the overall ecosystem.

In sum, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It replicates the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting the project under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not remedy these shortcomings.

There are significant deficiencies in the evidential basis for the application. It lacks comprehensive and reliable baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it omits crucial impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As such, the Environmental Impact Assessment is incomplete, failing to provide an adequate understanding of the likely significant effects or residual impacts.

Procedural oversights are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact

Assessment represents 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.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it show that health and wellbeing impacts are acceptable. There is also a lack of evidence for a net economic benefit due to the absence of tourism impact modelling, and the cumulative effects of both offshore and onshore elements have not been adequately assessed, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, thus preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of informational deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory 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]

Member of the public 2006

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and proximity of the proposed turbines raise significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly given the unprecedented nature of this development in the area.

The application lacks sufficient evidential support for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, reliance on unspecified mitigation measures means their effectiveness cannot be evaluated, resulting in documentation that does not provide a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects are not substantiated by robust evidence.

There are substantial policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to show compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the proposal's acceptability in policy terms.

Taken together, the absence of adequate information, the reliance on undefined mitigation measures, and the evident policy non-compliance highlight that the application is incomplete. In these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report demonstrates substantial deficiencies, failing to deliver a comprehensive, transparent, and trustworthy evaluation of the anticipated environmental impacts associated with the proposal. Notably, the absence of specific turbine dimensions, layouts, or configurations due to the reliance on a flexible Project Design Envelope creates considerable uncertainty. This lack of clarity

undermines the assessment's integrity, leading to the potential that the impacts delineated may not accurately mirror the eventual development, thus obstructing both public and competent authority comprehension of the true nature of environmental effects.

Consent for the application is predicated on the assumption that environmental harm will be addressed through unspecified mitigation measures, monitoring strategies, and management plans, which remain undefined. This approach defers critical information to stages following consent, rendering it impossible to evaluate the effectiveness or assess residual impacts meaningfully. Such deferral contravenes the Environmental Impact Assessment framework's intent, which mandates that significant effects and mitigation be clearly established prior to determination.

The report further reveals considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Consequently, this engenders uncertainty concerning the magnitude and significance of impacts, especially in instances where findings of negligible or non-significant effects are presented without adequate supporting data. This insufficiency obstructs a thorough understanding of cumulative and worst-case impacts, while introducing scientific uncertainties that stand in conflict with statutory obligations.

As a direct result of these inadequacies, the application fails to satisfy the evidential standard stipulated under the Habitats Regulations, which demands the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle is thus invoked, particularly regarding protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been comprehensively assessed or that appropriate safeguards exist.

Collectively, the reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data culminate in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies preclude a lawful and rigorous appraisal of environmental effects, thereby placing the competent authority in a position where it cannot make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The lack of a structured and comparative assessment of alternatives represents a significant deficiency in the application, undermining compliance with the Environmental Impact Assessment regime. It fails to provide a thorough evaluation of realistic alternatives based on environmental effects and instead offers only a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been properly identified or assessed in preference to more damaging solutions.

Furthermore, the application does not include a transparent or evidence-based comparison of different offshore locations, development scales, or design configurations. Specifically, it does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be reduced. The sensitivity of the West Lewis coastline is crucial, and the absence of analysis regarding proximity to shore prevents any conclusion that the proposed siting is the least damaging option.

Deficiencies in cable routing and landfall assessment are also evident, as there is insufficient evidence that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation through design has not been applied, leading to a reliance 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 failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to determine whether less harmful and more appropriate alternatives exist. Without a comprehensive alternatives assessment, it cannot be established that the proposal is sustainable or compliant with policy.

From a policy standpoint, these inadequacies compromise alignment with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured assessment is a material omission that contributes to the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development poses serious concerns regarding its impact on marine ecology and protected species within the West Lewis coastal environment, a sensitive and biologically rich area. The assessment provided is significantly lacking, as it fails to deliver a comprehensive and reliable understanding of the ecological receptors present. The baseline data is incomplete, and the methodologies employed are insufficient to accurately capture the presence, behaviour, and habitat use of vital species.

A particularly troubling oversight is the inadequate recognition of otters, classified as a European Protected Species. The application does not appropriately assess their active utilisation of coastal areas for foraging and movement. Without a thorough consideration of their core foraging range and behavioural patterns, the potential impacts from construction-related disturbance, noise, and increased human activity remain unexamined. This gap severely undermines any assertions regarding the lack of significant effects on this species.

Moreover, the assessment of basking sharks suffers from significant shortcomings, primarily due to the reliance on aerial surveys that introduce a considerable detection bias, especially in challenging Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, particularly when juxtaposed with established land-based observations that indicate their frequent use of these waters. The omission of such pertinent data contributes to an incomplete baseline and diminishes the credibility of the findings presented.

These methodological flaws mean that any conclusions indicating negligible or non-significant effects rely more on assumptions than on substantial evidence. The insufficient baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. Consequently, there is considerable uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. This level of uncertainty prevents the ability to rule out adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent cannot be legally justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in its ornithological assessment. There are considerable gaps in the evidence and inconsistencies that challenge its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to convincingly demonstrate that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A major contradiction is evident, as the developer asserts that there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions are not backed by the necessary evidence. The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of these feeding grounds is not thoroughly addressed, and the reliance on modelling approaches introduces uncertainty,

particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality, especially given the incomplete baseline data and lack of understanding of behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor poses an additional significant risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term consequences of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not 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, alongside 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, obstructing a lawful conclusion in favour of consent.

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

Overall, the assessment is deemed unreliable due to internal inconsistency, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and environmental impacts is significantly inadequate, failing to capture the true extent of change and the sensitivity of the landscape. The character of the West Lewis coastline, marked by its open Atlantic horizon and undeveloped nature, embodies a strong sense of remoteness. The proposed large-scale turbines located near the shoreline would create an unbroken and overwhelming industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application lacks a thorough representation of the magnitude of this visual change. Given their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not adequately articulate this level of impact or its significance within such a sensitive landscape.

Methodological concerns arise in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may fail to fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage

sites and high-value landscapes. This raises the possibility that the true magnitude of visual impact has been understated, thus undermining the credibility of the assessment.

Another critical shortfall is the lack of evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments exist within a wider landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these important assets as isolated, neglecting their interdependence and leading to an incomplete analysis of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these essential connections, transforming how heritage assets are perceived and disrupting their relation to the natural horizon. This not only poses a visual impact but also inflicts broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the protection of natural environments and historic assets. The proposed scale of change is fundamentally at odds with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertions of compliance with policy requirements.

It is evident that the identified impacts are not amenable to effective mitigation. The scale, height, and proximity of the turbines would ensure their presence is both dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation strategies.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, making it impossible to fully evaluate the likely environmental effects. The planned works include extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the lack of fully developed Construction Environmental Management Plans or Pollution Prevention Plans raises serious concerns. The application leans on mitigation and contingency measures that are to be defined after consent, which undermines any meaningful assessment of their potential adequacy and effectiveness.

This reliance on undefined future measures is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters

and crucial habitats that are susceptible to both sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate detail on the methods for prevention, control, or monitoring of these risks.

Moreover, there is significant uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application limits the assessment of whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and compromises the ability of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and their mitigations are assessed before consent is granted; failure to provide this information means a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding marine species and habitats along the West Lewis coast, a region that not only boasts a diverse marine ecosystem but also supports an active fishing industry. The assessment provided is inadequate, lacking a robust evaluation of both ecological and socio-economic impacts. It neglects to demonstrate how these vital uses and habitats can be protected without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be displaced without repercussions. There is no evidence presented to suggest that alternative fishing grounds are available or can sustain the additional pressure resulting from this displacement. This oversight is particularly alarming, as it risks leading to overfishing in different areas and could have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based assessment, the potential impacts

on fisheries and the livelihoods dependent on them remain obscured.

In addition, the proposal introduces considerable risks to marine life, notably through the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb marine species across considerable distances, including the local bottlenose dolphin population. The anticipated disturbance to a significant portion of these dolphins raises profound concerns, yet the application appears to minimise the severity of these effects, lacking adequate supporting evidence.

Furthermore, there is an evident inconsistency in the application. While it acknowledges the necessity for licenses to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about its compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

The assessment also overlooks the 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 the socio-economic conditions they support.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with current marine users or avoid adverse effects on marine biodiversity. This lack of clarity prevents the determination of whether the proposal represents sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the crucial aspects of dark skies and nocturnal wildlife, marking a significant omission. The West Lewis coastline boasts exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly for developing sectors like astro-tourism. However, the proposal includes permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

Furthermore, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This oversight is especially troubling given the importance of dark skies to the area's identity. The lack of

consideration for these impacts results in a clear deficiency in the overall environmental and landscape assessment.

Equally concerning is the complete absence of an evaluation of the effects on nocturnal wildlife. Sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk from artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting might affect these species or contribute to mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or its associated risks. Kittiwakes, for instance, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of site-specific night-time data results in a critical gap in understanding the 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 is not met, thereby invoking the precautionary principle and obstructing a lawful determination.

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

In summary, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. Without baseline data, impact modelling, and species-specific analysis, the application remains incomplete and fails to support a lawful determination.

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.

Yours faithfully,

[Redacted]

Member of the public 2007

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 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. Concerns arise due to the scale and proximity of the turbines, which pose significant questions regarding their compatibility with statutory requirements and national policy, as well as the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, while baseline information is inconsistent and insufficient, leaving key aspects of the proposal undefined. The use of a flexible design framework obscures the understanding of likely significant effects. Additionally, reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are considerable and clear conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements for protecting biodiversity, climate interests, and environmental integrity will be met. These inconsistencies directly challenge the statutory tests for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

This proposal's scale is unprecedented in this region, with large turbines being positioned near the shoreline, raising profound concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and inadequate for supporting a lawful determination. In such circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a deeply concerning reliance on an undefined Project Design Envelope, lacking any firm commitment to specific turbine dimensions, layouts, or configurations. This ambiguity introduces substantial uncertainty, hindering the ability

to apply a worst-case scenario consistently. As a result, the Environmental Impact Assessment Report fails to deliver a full, transparent, or reliable account of the likely environmental effects of the proposal. The implications of this deficiency are profound, as the assessment's integrity is compromised, preventing both the public and the competent authority from fully grasping the true extent of the environmental impacts.

Moreover, the application hinges on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation prior to determination.

Compounding these issues are significant evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn. The absence of sufficient information not only obscures a clear understanding of cumulative and worst-case impacts but also introduces scientific uncertainty that fails to meet statutory requirements.

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

In summary, the combination of reliance on an unspecified design envelope, the absence of specified mitigation, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These substantial deficiencies hinder a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application is fundamentally flawed in its assessment of alternatives, failing to adhere to the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it presents a narrative that recounts the project’s evolution. This method does not sufficiently demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparency and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not illustrate that the developer has meaningfully considered the possibility of placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline, coupled with the critical role of proximity to shore in determining impacts, makes the absence of such an analysis particularly significant. This shortcoming inhibits any conclusion that the proposed siting is the least damaging option available.

These deficiencies also extend to the assessment of cable routing and landfall, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate a failure to apply mitigation by design, leading instead to an over-reliance on post-design mitigation measures.

Consequently, the application does not effectively demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether less harmful and more suitable alternatives exist. Without a thorough alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, particularly concerning the West Lewis coastal environment, which is a sensitive and biologically active marine system. The methodologies employed are inadequate for capturing the presence, behaviour, and habitat use of species, resulting in an insufficient evidential basis for evaluating impacts.

Significantly, the application does not adequately recognise or assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated. This inadequacy compromises any conclusions drawn about the absence of significant effects on this species.

Furthermore, there are notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys creates significant detection bias, particularly under

Atlantic conditions. This methodology likely underestimates the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the real scale 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 it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the development proposal is fundamentally flawed, containing significant gaps in evidence and inconsistencies that question its conclusions. This proposed development is situated on the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are located nearby, yet the assessment fails to properly evaluate the risks of displacement, collision, and habitat loss.

There exists a notable contradiction in the application. The developer claims no significant adverse effects will result from the project while simultaneously advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, revealing that the conclusions drawn are not backed by solid evidence.

Furthermore, the assessment lacks adequate proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be negatively impacted. The critical nature of these feeding grounds is not fully acknowledged, and the reliance on modelling introduces uncertainty. This is particularly concerning for species in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given that baseline data is

incomplete and the behavioural responses of these birds are not fully understood.

The proposed turbine siting within a recognised migratory corridor introduces further 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 within this corridor, particularly concerning species with small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to assert that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, combined with data deficiencies and limitations in modelling, indicates that the assessment has not reached the standard of beyond reasonable scientific doubt. This invokes the precautionary principle and undermines the legality of a conclusion in favour of consent.

In summary, the identified deficiencies highlight a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Altogether, the assessment is deemed unreliable due to inconsistencies, methodological weaknesses, and insufficient evidence. These issues hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment surrounding community identity and cultural heritage is fundamentally flawed, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. This application adopts an overly simplistic viewpoint, treating heritage merely as a collection of isolated, static elements rather than recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment portrays them as fixed features, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This oversight leads to an incomplete understanding of cultural implications and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, traditions, and the long-standing bond between the community and the coastal environment. These elements are vital to the identity of the area, yet they are entirely omitted from the assessment, which represents a considerable gap. Without examining these factors, one cannot fully comprehend the cultural impact of the proposed development.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population possesses a unique cultural identity, characterised by recognised traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of genuine engagement undermines the credibility of the assessment and neglects established principles of participation regarding cultural and environmental decisions.

A crucial procedural oversight is the absence of 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 cannot meet its legal obligation to assess the social, cultural, and economic repercussions on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and spaces. The failure to consider both tangible and intangible heritage, alongside the lack of recognition for living cultural practices, signifies a clear deviation from policy requirements.

Ultimately, the combined failure to adequately evaluate living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural ramifications of the proposed development have not been thoroughly evaluated, leaving the application lacking a solid foundation for assessing the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from comprehensively understanding the social risks highlighted by the developer's own research. Summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement and are not speculative, yet the inability to access the complete assessment prevents proper scrutiny of these findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” identified in the developer’s findings. Nonetheless, these impacts have not been fully incorporated into the main application or given the necessary weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be compromised.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

The procedural ramifications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application and fails to meet the evidential requirements outlined by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment, obstructing a lawful determination and highlighting that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

Moreover, the assessment fails to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context, linked visually and spatially to the Atlantic horizon. The evaluation treats these sites as standalone assets, neglecting their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships,

altering how heritage assets are perceived and severing their connection to the natural horizon. This change represents not just a visual concern but a more profound cultural and spatial detriment that has not been sufficiently examined within the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, leaving critical details lacking for evaluating the likely environmental effects. Substantial seabed preparation and installation works will take place within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future mitigation and contingency measures that are to be prepared after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially alarming, given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and potential accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures exacerbates these concerns.

By postponing contingency planning until after consent, the application restricts the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation need to be assessed prior to consent, and when such information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application lacks comprehensiveness, resulting in an inadequate analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem alongside an active fishing industry, yet the proposal does not convincingly show that these essential habitats and activities can be preserved or sustained without substantial disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is a notable absence of evidence regarding the availability or accessibility of alternative fishing grounds capable of accommodating any additional pressure. This gap is critical, as displacement could lead to overfishing in other areas, potentially resulting in severe economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, it becomes impossible to fully grasp the implications for fisheries and local livelihoods.

Moreover, the proposed development presents considerable threats to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is anticipated to create disturbances over extensive distances, adversely affecting species such as dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application diminishes the seriousness of these effects, lacking adequate evidence to support such claims.

There is also an evident contradiction in the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that these impacts are negligible. This inconsistency undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm is at a level necessitating

legal approval.

Additionally, the assessment does not adequately consider cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these interconnected effects is essential for determining the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short in demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which hinders any conclusion regarding its sustainability.

In summary, the combination of insufficient evidence concerning fishing displacement, an underestimation of acoustic effects, and internal inconsistencies collectively render the assessment incomplete and untrustworthy. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is incomplete and fails to capture the full range of impacts associated with what constitutes a single integrated project. The onshore and offshore components, including the construction of a substation near Stornoway and cabling across protected moorland, are linked. However, they are currently assessed separately, which leads to a fragmented understanding of the true environmental and socio-economic consequences.

Significant ecological risks arise from the proposed works, particularly due to excavation in areas of deep peat on Barvas Moor, which is both a vital carbon store and an ecologically sensitive area. The application does not adequately address or assess these impacts, leading to an incomplete picture of the project's overall environmental footprint. Additionally, sensitive habitats, such as machair systems and peatland environments, are protected under policy, yet the application does not show that impacts on these areas have been thoroughly evaluated or that suitable avoidance measures are in place, resulting in a notable gap in evidence regarding biodiversity protection.

The proposal further raises alarm over carbon balance. Disturbing peatland has the potential to release stored carbon, thus creating a carbon debt that undermines the objectives of renewable energy initiatives. The application inadequately tackles this issue, failing to demonstrate 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, as the application does not provide evidence of having initiated the necessary consents or processes. This absence raises concerns about the feasibility and legality of the project's implementation.

On a policy level, the disjointed assessment of the project and the lack of demonstrated protection for peatlands, habitats, and land use interests conflict with established frameworks, including the National Marine Plan and National Planning Framework 4. The failure to show that impacts can be avoided or mitigated further weakens the application.

In summary, the combination of separating project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts results in a substantial shortfall in the application, rendering it incomplete and unreliable. This compromises the possibility of a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It replicates the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting the project under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not remedy these shortcomings.

There are significant deficiencies in the evidential basis for the application. It lacks comprehensive and reliable baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it omits crucial impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. As such, the Environmental Impact Assessment is incomplete, failing to provide an adequate understanding of the likely significant effects or residual impacts.

Procedural oversights are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment represents 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.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it show that health and wellbeing impacts are acceptable. There is also a lack of evidence for a net economic benefit due to the absence of tourism impact modelling, and the cumulative effects of both offshore and onshore elements have not been adequately assessed, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied. This invokes

the precautionary principle, thus preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of informational deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory 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]

Member of the public 2008

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the relevant marine licensing and Environmental Impact Assessment frameworks. It highlights significant deficiencies across planning, environmental, cultural, and procedural dimensions. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the proposal emerge due to its potential incompatibility with statutory requirements, national policy, and sustainable development principles.

A critical issue lies in the application's inadequate evidential basis for a lawful determination. There is a notable absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The proposal's flexible design framework hinders a clear assessment of likely significant effects. Reliance on unspecified mitigation measures precludes an evaluation of their potential effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

Moreover, there are evident and substantial conflicts with established policies. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate adherence to national obligations aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's policy acceptability.

The unprecedented scale of the proposal raises further alarm, with large turbines positioned uncomfortably close to the shoreline, which introduces serious concerns related to landscape capacity, visual impact, and environmental repercussions. Collectively, the insufficiency of information, dependence on undefined mitigation, evidential shortcomings, and clear policy discrepancies illustrate that the application is incomplete and incapable of facilitating a lawful determination. In light of these circumstances, it is imperative that the precautionary principle be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, failing to recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are interconnected. The application employs a simplistic approach, viewing heritage as separate, unchanging assets instead of acknowledging their continuous social, cultural, and spiritual roles 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 sites for burial and spiritual practice; however, the assessment characterises them merely as static features, overlooking their ongoing use, significance, and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and neglects their importance in community life.

Moreover, the assessment does not address intangible cultural heritage, which includes the Gaelic language, traditions, and the longstanding connection between the community and its coastal environment. These aspects are vital to the area's identity but are completely omitted from the evaluation, representing a significant gap. Understanding the cultural impact of the development is impossible without considering these elements.

Additional concerns arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not undergone a process of Free, Prior and Informed Consent. The lack of meaningful engagement raises questions about the validity of the assessment and fails to align with established principles regarding participation in matters affecting cultural and environmental interests.

There is also a critical procedural shortcoming in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone hampers lawful decision-making.

From a policy standpoint, these deficiencies directly contradict the National Planning Framework 4, particularly concerning the protection of historic sites and places. The neglect to consider both tangible and intangible heritage, as well as the failure to recognise living cultural practices, indicates a clear divergence from policy standards.

When considered collectively, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application fails to provide a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents, but the full report has not been made public. This omission creates a significant evidential gap and hinders both public understanding and the competent authority's ability to evaluate social risks identified in the developer's research. Available summaries reveal that residents are already facing measurable 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 not mere speculation. However, the lack of access to the complete assessment limits scrutiny of the findings and affects the evaluation of their significance in the decision-making process.

The proposal has also been perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given the necessary attention. The failure to disclose the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application does not provide a full evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, existing evidence suggests negative effects that have not been fully revealed. Without the complete assessment, it cannot be shown that the application complies with this policy.

The procedural implications of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, marking a material omission within the application. This represents a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This limits the ability to make a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate and does not properly address the extent of the anticipated change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the

shore would impose a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to accurately depict the magnitude of the anticipated visual change. Given their scale and proximity, the turbines would dominate the views from residential areas, historic locations, and frequently visited coastal sites. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

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

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

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

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

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

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These

shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. A key concern is the assumption made in the application that fishing activities can be displaced without any consequences. There is no evidence presented to support the availability or accessibility of alternative fishing grounds that can withstand additional pressure. This significant omission raises the risk of overfishing in other areas, which may have broader economic repercussions for the local fishing fleet. Consequently, without a clear, evidence-based assessment, the implications for fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during the construction phase. The prolonged high-energy hammer piling is likely to cause disturbances over considerable distances, impacting species such as dolphins. Concerns arise from the predicted disturbance to a considerable portion of the local bottlenose dolphin population, yet the application tends to downplay these effects, lacking sufficient supporting evidence.

Additionally, there is an inconsistency within the application itself, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders any determination of the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with both the National Planning Framework 4 and 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 prevents any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project involves both offshore turbines and onshore works, which are interconnected yet assessed separately. This fragmented assessment does not reflect the full extent of environmental and socio-economic impacts. The onshore works encompass cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly in Barvas Moor, a crucial carbon store and ecologically important habitat. The application lacks a thorough assessment of these impacts, which hinders an understanding of the project's overall environmental footprint.

By not fully addressing onshore impacts, the application obstructs a proper evaluation of cumulative effects. Environmental Impact Assessment procedures stipulate that all project components must be considered collectively. The division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are inadequately understood.

Additionally, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to show that these habitat impacts have been thoroughly assessed or that appropriate avoidance measures are in place, creating a clear gap in biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy objectives. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence provided that necessary consents or processes have been initiated, which raises doubts about the project's deliverability and legal compliance.

From a policy standpoint, the failure to assess the project in its entirety and ensure protection of 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.

Overall, the separation of project components, the 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.

TOURISM

The assessment regarding the impacts of tourism is severely lacking and does not adequately address the economic and social consequences for a vital sector of the Isle

of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which is fundamentally reliant on these attributes. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this crucial analysis, it remains uncertain whether the proposed development would bring a net economic benefit or jeopardise an established and thriving sector.

Moreover, the evaluation neglects to acknowledge the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in shaping visitor experiences and supporting emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, resulting in a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the failure to evaluate tourism impacts carries broader ramifications 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 appropriately assessed as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity of proving net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide enough evidence for the competent authority to accurately evaluate the economic consequences of the proposal.

Ultimately, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependence leads to a significant evidential gap. This inhibits 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 must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. It reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection,

landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data are present, undermining the reliability of the evidential basis for determination. The proposal employs an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness, inhibiting a comprehensive understanding of significant effects and residual impacts.

The procedural shortcomings are also significant. The absence of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018. Moreover, the failure to provide a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues render the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural area preservation, and cultural heritage safeguarding. It does not prove that health and wellbeing impacts are acceptable, nor does it present evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately addressed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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

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

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

Additional Comments

Here are my points of objection to this Development.

1. Mass industrialisation of a very rural and environmentally sensitive area.

2. It is visually way out of proportion with the natural and built environment round about.

3. This is an area where people come for recreation and to experience remote places.

4. This development demands large scale supply infrastructure which will detrimentally affect other areas on the Island such as the Barvas moor and round about Stornoway/ Marybank.

5. It requires pylons and other infrastructure in the Highlands, where there are also major objections. These have taken a great amount of effort to be heard and we are yet to see if any notice is taken of them.

6. The cultural impact will be significant on such a small population with challenges for population retention, employment for local businesses and the NHS with competition from outside contractors and the effect of hundreds of workers with no real commitment to to the Islands.

7. Benefits go to large multi-national share holders who only want a profit out of the area.

8. Lack of grid access for smaller projects with bias to large projects.

9. Damage to fishing grounds and access to them.

10. Planners and government don't listen now, what will happen if there is a problem once the plans are past?

11. Lack of environmental benefits and the damage caused.

12. Health concerns baised on the Irish wind farms which have had to be closed down.

Not a project suitable for this area in anyway whatsoever.

Yours faithfully,

[Redacted]

Member of the public 2009

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 regimes. The grounds for this objection arise from an assessment of the Environmental Impact Assessment Report and associated documentation, which reveal substantial deficiencies in planning, environmental considerations, cultural factors, and procedural compliance. Situated off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. The design, scale, and proximity of the wind farm proposal raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents missing critical environmental data, limited and inconsistent baseline information, and unclear aspects of the proposal. The flexible design framework inhibits a proper understanding of the likely significant effects, and the unspecified mitigation measures raise doubts about their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which lack robust supporting evidence.

There are evident and serious conflicts with policy. 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 compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability from a policy perspective.

The scale of this proposal is unprecedented for the location, with large turbines planned in close proximity to the shoreline, raising significant issues 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 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.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis represents a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, providing an incomplete and unreliable understanding of ecological receptors. The methodologies employed do not adequately capture

important aspects such as species presence, behaviour, and habitat use. Consequently, the assessment fails to provide a sound evidential basis for evaluating impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within the west coast of the Isle of Lewis, a region recognised for its internationally important seabird populations, many of which are already experiencing decline. However, the ornithological assessment associated with this application is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the necessary evidential standard, that these seabird species will not be adversely affected. The development is situated within key foraging areas

and migratory pathways, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

Moreover, there is a fundamental contradiction within the application. The developer asserts that there will be no significant adverse effects, while simultaneously advancing a Habitats Regulations derogation case, which is only required in instances where significant harm is anticipated. This inconsistency raises concerns regarding the reliability of the assessment and suggests that the conclusions drawn are unsupported by the underlying evidence. The assessment also lacks sufficient evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly addressed, and the reliance on modelling approaches brings uncertainty, particularly for species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given that baseline data is incomplete and the behavioural responses of these species are not fully understood.

The siting of turbines within a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential effects 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, combined with data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering the ability to arrive at a lawful conclusion in support of consent.

Furthermore, the deficiencies highlighted also indicate a failure to comply with the 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 places the proposal in direct conflict with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These issues hinder a robust 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 West Lewis coastline embodies a living cultural landscape, where community, environment, language, and tradition are interwoven. However, the assessment of cultural heritage and community identity is severely lacking. It approaches heritage as isolated, unchanging assets, neglecting their dynamic social, cultural, and spiritual

significance to the community.

Cemeteries at Dalmore, Bragar, and Barvas serve as vital places of burial and spiritual practice. Instead of acknowledging their ongoing use and importance, the assessment misclassifies them as static features, overlooking the impact that development could have on their surroundings. This incorrect interpretation leads to a partial understanding of cultural effects and dismisses their integral role in community life.

Moreover, the evaluation overlooks intangible cultural heritage, such as the Gaelic language and traditions that define the area's identity. These essential elements are conspicuously absent from the assessment, resulting in a critical oversight. Without addressing these factors, the true cultural implications of the development cannot be accurately gauged.

Community rights and engagement also raise concerns. The Gaelic-speaking population maintains a distinct cultural identity, characterised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement questions the assessment's validity and ignores established principles of participation regarding cultural and environmental issues.

Additionally, there is a notable procedural failure due to the absence of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This missing evaluation prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, demonstrates a clear divergence from policy expectations.

Overall, the disregard for living heritage, intangible cultural values, community rights, and legal obligations culminates in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, leaving the application without a solid foundation for understanding the true cultural costs involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the installation of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped nature. This change would create a continuous industrial presence that fundamentally transforms the area, leading to a permanent alteration of the landscape. The assessment of seascape, landscape, and visual impacts associated with this development is significantly lacking, failing to adequately reflect the magnitude of change and the sensitivity of the local environment.

The scale and proximity of the turbines would lead to their dominance in views from

residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the naturalness and sense of remoteness that define the region. Furthermore, the assessment does not adequately communicate the significance of these impacts in a landscape that is already sensitive.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that some viewpoints do not adequately 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 calls into question the reliability of the assessment.

Another critical shortcoming is the failure to evaluate 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, tied together through visual and spatial relationships with the Atlantic horizon. The assessment wrongly treats these assets as isolated, leading to an incomplete understanding of the potential impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and affecting their connection to the natural environment. This presents not merely a visual concern but also a broader cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 by failing to protect natural places and historic assets. The scale of proposed changes does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case impact assessment further undermines any assertions of policy compliance.

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

In summary, the assessment does not accurately convey the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and underscore the conclusion that the proposal is at odds with the necessary protection of this significant landscape.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings regarding the assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-economic impacts. Off the West Lewis coast, the waters are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not

convincingly demonstrate that these vital resources can be preserved or maintained without considerable disruption.

A critical concern is the premise that fishing activities can be displaced without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional strain. This significant gap raises the risk of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Without a clear, evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses serious risks to marine species, primarily due to the underwater noise produced during construction. The expected high-energy hammer piling over an extended duration is likely to disturb marine life over large areas, impacting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is alarming; nonetheless, the application downplays these effects without providing adequate supporting evidence.

There exists a troubling inconsistency within the application regarding the acknowledgment of the need for licenses to permit harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly in situations where anticipated harm necessitates legal authorisation.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. No assessment has been made concerning the impacts of artificial lighting on species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, all of which are highly sensitive to light. These species

can experience disorientation due to phototaxis, leading to an increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which means it fails to consider how the proposed aviation lighting could affect these species or potentially increase mortality rates.

Moreover, the assessment relies on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are similarly vulnerable to the effects of artificial lighting. This oversight creates a critical gap in understanding the ecological impacts that the proposal may have on local wildlife.

The introduction of permanent red aviation lighting is another significant concern. This lighting would be visible over long distances, creating an intrusive "wall of light" across the western horizon, which would fundamentally alter the night-time environment. The assessment does not address how this would impact visual amenity, landscape character, or the experience of residents and visitors, despite the importance of dark skies to the area's identity and its emerging tourism sectors, such as astro-tourism.

From a policy standpoint, these omissions conflict with National Planning Framework 4, which relates to the protection of natural places and environmental quality. The absence of an assessment of dark skies undermines the broader evaluation of landscape and seascape impacts, as the night-time character is an integral part of the environment.

Overall, the failure to assess the impacts on dark skies and nocturnal wildlife constitutes 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. Without a thorough assessment, it is impossible to ascertain whether protected species or designated sites would be adversely affected, which engages the precautionary principle and necessitates a more cautious approach.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential benchmarks. It echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was determined, yet it is now introduced under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential foundation for determination, characterised by critical gaps in baseline data, the use of an undefined design envelope, unspecified reliance on mitigation measures, and omissions regarding key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual

impacts.

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

The proposal conflicts directly with National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural areas, and cultural heritage. It does not establish that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, leaving effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and inhibiting a lawful conclusion regarding the acceptability of impacts.

The proposal would impose substantial and irreversible changes on 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 are permanent effects that cannot be mitigated to an acceptable degree.

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

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

Additional Comments

The destruction of natural environments with this industrialisation agenda is an absolute disgrace. Those that are trying to destroy our islands and coastline with these turbines should be ashamed of themselves.

Yours faithfully,

[Redacted]

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