

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on an examination of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies related to planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns arise from the scale, design, and proximity of the proposal, which raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Moreover, key elements of the proposal remain undefined, leading to ambiguity in understanding potential significant effects. The use of a flexible design framework complicates the ability to assess these effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There exist substantial conflicts with established policies. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and well-being. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for obtaining consent and compromise the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant issues concerning landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and does not support a lawful determination. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

In summary, the combination of an undefined design envelope, the absence of specified mitigation, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application suffers from significant inadequacies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a detailed and reasoned analysis of realistic alternatives based on their environmental implications, the submission offers a narrative detailing the evolution of the project. This narrative does not adequately demonstrate that less harmful options have been identified, assessed, and chosen over more damaging

alternatives.

Moreover, there is a notable lack of a transparent, evidence-based comparison regarding alternative offshore locations, scales of development, or design configurations. In particular, the application does not convincingly show that the developer has thoroughly considered the possibility of positioning the turbines further offshore, where impacts on visual aesthetics, ecological systems, and coastal areas could potentially be lessened. The sensitivity of the West Lewis coastline highlights the critical nature of proximity to shore in evaluating the impacts; therefore, the absence of this essential analysis raises concerns about whether the proposed siting is truly the least damaging choice.

These deficiencies also extend to the evaluation of cable routing and landfall assessments. There is insufficient evidence to indicate that alternative routes have been adequately examined to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis signal a failure to apply mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout considerations, or infrastructure routing. This shortcoming represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to determine the existence of less harmful and more appropriate alternatives. Without a thorough alternatives assessment, it is impossible to conclude that the proposal is sustainable or compliant with policy.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and the wellbeing of communities. The lack of a structured and comparative assessment constitutes a material omission that leads to the conclusion that the application has not undergone adequate scrutiny and therefore cannot receive lawful approval.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and does not adequately capture the ecological receptors in the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies employed fail to sufficiently document the presence, behaviour, and habitat usage of various species. Consequently, the assessment lacks a reliable evidential basis for evaluating impacts.

A significant oversight concerns otters, a European Protected Species, as the application does not adequately acknowledge their use of coastal regions for foraging and movement. The failure to assess their core foraging range and behavioural patterns

means that the potential consequences of construction disturbance, noise, and increased activity remain inadequately evaluated. This oversight undermines any assertions regarding the lack of significant effects on this species.

Additionally, the assessment of basking sharks reveals further shortcomings. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence. This is in stark contrast to established land-based observations that indicate a frequent presence in these waters. The omission of this crucial data results in an incomplete baseline, which compromises the reliability of the conclusions drawn.

The methodological weaknesses contribute to findings of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of comprehensive baseline data inhibits any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual risks posed to marine species and their habitats.

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

In summary, the presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and contribute to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. This development is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not demonstrate to the required evidential standard that these species will not be adversely affected.

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

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed. It overlooks this area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead, the application adopts a simplistic view, treating heritage as a collection of isolated and unchanging assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are mischaracterised as static features. The assessment fails to consider their continued use and meaning, along with the potential impact of development on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community

life.

Moreover, the application does not take into account intangible cultural heritage, which includes the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity and are glaringly absent from the assessment, representing a significant shortcoming. The cultural impacts of the development cannot be adequately understood without these considerations.

There are additional concerns related to community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as that of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been observed. The lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

A crucial procedural failure is the omission of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thus preventing a lawful determination.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and locations. The disregard for both tangible and intangible heritage, alongside a failure to recognise living cultural practices, constitutes a clear deviation from policy requirements.

Collectively, the neglect to assess living heritage, intangible cultural value, community rights, and legal obligations results in a substantial evidential gap. The cultural impacts of the proposed development have not been properly evaluated, and the application fails to provide a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and poses significant risks to our community's health, wellbeing, and identity. While the developer engaged local residents through focus groups, the failure to publish the complete report creates a substantial evidential gap. This absence not only limits public understanding but also hampers the competent authority's ability to gauge the full spectrum of social risks identified in the developer's own research.

Residents are already feeling the weight of this proposal, experiencing measurable stress, anxiety, and concern due to its scale and proximity. These effects are grounded in direct engagement, thereby reinforcing their legitimacy. Yet, without access to the full assessment, the findings remain shrouded in ambiguity, obstructing proper scrutiny

and the evaluation of their significance in the decision-making process.

Moreover, there is clear evidence that this proposal is perceived as a threat to community identity and cohesion, with concerns about "cultural loss" arising from the developer's findings. Unfortunately, these critical impacts have not been adequately integrated into the main application nor afforded the necessary weight in the evaluation process. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude. The decision-making process requires a complete evidential basis to assess the balance between the benefits and potential harms of the proposal.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the evidence suggests existing adverse effects that have not been fully disclosed. Consequently, the absence of the full assessment makes it impossible to demonstrate compliance with this policy.

The implications of this omission are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment. This represents a material flaw in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Taken together, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leaves the evaluation incomplete and unreliable. This ultimately undermines the lawful determination of the application, highlighting that it lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly inadequate. It does not capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, a lack of development, and a strong sense of remoteness. Introducing large turbines near the shoreline would create a continuous industrial presence, which would fundamentally change this character and lead to a permanent transformation of the landscape.

The application does not effectively convey the magnitude of the visual changes expected. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and diminish the naturalness and sense of remoteness that the area currently possesses. The assessment fails to articulate this impact or its importance within such a sensitive landscape.

Methodological issues also arise concerning how visual viewpoints have been selected and presented. It appears that these viewpoints do not fully reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and valued landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby reducing the reliability of the assessment.

Moreover, there is a notable failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated features rather than recognising 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 connections, altering how heritage assets are experienced and diminishing their relationship with the natural horizon. This represents not only a visual effect but also broader cultural and spatial harm that the application has not adequately addressed.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The level of change proposed is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario further weakens claims of policy adherence.

Additionally, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. The resultant change is therefore fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is inadequate, failing to provide essential details needed to evaluate likely environmental effects. The project entails considerable seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will be formulated after consent is granted, which hinders any meaningful assessment of their potential adequacy or effectiveness.

This reliance on unspecified future measures raises significant concerns, particularly

considering the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and vital habitats that are at risk of damage from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is received, the application prevents a proper evaluation of whether suitable safeguards are in place to respond to pollution incidents. This creates procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and mitigation must be conducted prior to granting consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainties regarding potential impacts collectively render the assessment materially deficient. These issues obstruct a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposed application raises significant concerns regarding its assessment of fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry, yet the evaluation does not adequately address how these essential habitats and activities will be protected or maintained.

A critical flaw in the assessment is the assumption that fishing can be relocated without negative effects. There is no evidence provided that alternative fishing grounds exist or are capable of sustaining the added pressure from displaced activities. This lack of information is crucial, as such displacement could lead to overfishing in different areas and have broader economic repercussions for the local fishing fleet.

Without a thorough and evidence-based evaluation, the impacts on both fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The use of high-energy hammer piling for extended periods is likely to disturb marine life over considerable distances, notably affecting species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population raises serious issues. However, the application appears to minimise these concerns without providing adequate supporting evidence.

There is also a notable inconsistency in the application regarding the necessity of licences for any harm to European Protected Species. While it acknowledges the need for legal authorisation where harm is anticipated, it simultaneously asserts that the impacts are negligible. This contradiction calls into question the reliability of the assessment and raises issues about compliance with the Habitats Regulations.

Furthermore, the evaluation does not adequately consider the cumulative impacts from various pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or avoid significant negative impacts on marine biodiversity, which obstructs any conclusion that it represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of onshore infrastructure, failing to consider the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are interlinked; however, the assessment treats them separately, which results in a fragmented analysis that obscures the overall environmental and socio-economic effects.

Significant risks are posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application has not adequately demonstrated that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating an evidential gap regarding biodiversity protection.

Moreover, the onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. These works involve excavation in areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The failure to provide a comprehensive assessment of these impacts inhibits a complete understanding of the project's overall environmental footprint.

The lack of consideration for cumulative effects is evident, as the application has either excluded or deferred assessment of onshore impacts. The Environmental Impact Assessment process necessitates that all components of a project be evaluated collectively. The fragmented treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain unclear.

Concerns are also raised regarding the carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application has not sufficiently addressed this matter or shown that the overall carbon balance remains advantageous.

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

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

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts result in this part of the application being incomplete and unreliable, which prevents lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

A crucial oversight within the Environmental Impact Assessment is the complete lack of evaluation regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the growing importance of dark skies to tourism sectors such as astro-tourism, this omission is particularly

significant. Furthermore, the assessment fails to address potential impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collisions.

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

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

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

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

TOURISM

The assessment of tourism impacts within the application is severely lacking, failing to address the economic and social ramifications for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the area's unspoiled coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of the sector.

The significance of tourism is evident in its substantial growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this positive trend, the application does not analyse how the potential industrialisation of the seascape and the resultant loss of environmental quality might affect Tourism Gross Value Added or broader economic resilience. Without such analysis, it is impossible to ascertain

whether the proposed development would provide a net economic benefit or detract from a sector that is both established and expanding.

Furthermore, the assessment neglects to consider the crucial role of environmental quality in fostering tourism, particularly the significance of unspoiled landscapes and dark skies in enhancing visitor experience and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, creating a notable gap in understanding the impacts on a recognised and growing component of the local economy.

In an island community with limited economic diversification, the oversight in assessing tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with 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 need to demonstrate net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and considering the economic dependency of the island lead to a significant evidential gap. This undermines the ability to conduct a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

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.

Additional Comments

We live in one of the few remaining wildernesses in Britain, which is a precious asset in our modern world. We share this planet with other species- it is not ours to ruin as we see fit, mainly for greed and personal gain.

I believe this windfarm will destroy much that is valuable and the energy gained will not in anyway recompense the island and its environs. Climate change is a real threat, but in addressing it we should not cause further damage. This windfarm needs to be rethought and moved to a less sensitive environment- if, indeed, there is a place that it will not ruin.

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: 97404C0E

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Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. A detailed review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The development site is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles are paramount due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is missing, with baseline information being limited and inconsistent, leaving key elements of the proposal undefined. The flexible design framework impedes a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures hampers the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects, which are unsupported 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, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent, hindering the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, featuring large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, the evidential weaknesses, and the clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these conditions, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent or reliable depiction of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This lack of commitment prevents a consistent worst-case scenario analysis, ultimately undermining the integrity of the assessment. Consequently, the impacts presented may not accurately represent the actual development, leaving both the public and the competent authority unable to comprehend the true environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later hinders any meaningful evaluation of effectiveness or residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established prior to the determination of the application.

There are also considerable evidential shortcomings, including incomplete baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are presented without sufficient supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not meet the evidential requirements outlined in the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to the National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, since it fails to show that impacts have been fully assessed or that appropriate safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation strategies, and the gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It does not offer a structured and evidence-based comparison of realistic

alternatives based on environmental effects, instead providing a narrative of the project's evolution. This approach does not demonstrate that less harmful options have been properly identified and selected in preference to more damaging solutions.

In particular, the application lacks a transparent comparison of alternative offshore locations, development scales, or design configurations. Notably, there is no evidence that the developer has seriously considered the potential for placing turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, highlights that the absence of such an analysis hinders any conclusion that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is insufficient evidence indicating that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been employed, leading to an over-reliance on post-design mitigation measures.

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

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a material omission that ultimately contributes to the conclusion that the application has not been thoroughly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly inadequate, failing to provide a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area constitutes a highly sensitive and biologically active marine system, yet the baseline data presented is incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for assessing potential impacts.

One critical shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The omission of their core foraging range and behavioural patterns leads to a failure in evaluating the potential impacts of

construction-related disturbances, noise, and increased activity. This gap in the assessment undermines any assertions regarding the absence of significant effects on otters.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant contradictions that undermine its credibility, notably the developer's assertion of no significant adverse effects while simultaneously arguing for a Habitats Regulations derogation. This derogation is only pertinent where there is an expectation of substantial harm, casting doubt on the reliability of the assessment and suggesting that the conclusions are not well-supported by the evidence provided. Furthermore, the ornithological assessment is critically flawed, revealing substantial gaps in evidence and internal inconsistencies.

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline, yet the application fails to adequately prove that these species will not be adversely affected. Key foraging areas and migratory pathways, which are crucial for these populations, are not thoroughly evaluated in the assessment, particularly regarding displacement, collision risk, and habitat loss. The methodologies employed tend to underestimate potential mortality rates, especially given the incomplete baseline data and limited understanding of species' behavioural

responses.

Siting turbines within a recognised migratory corridor introduces a severe risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been sufficiently assessed, nor have the potential effects on species with limited global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold needed to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with gaps in data and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, obstructing a lawful conclusion in favour of consent.

The inadequacies identified also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted places the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable, due to its methodological weaknesses and insufficient evidence, preventing a comprehensive evaluation of impacts and leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

There are further issues regarding community rights and the lack of engagement with the Gaelic-speaking population, who possess a distinct cultural identity akin to Indigenous Peoples. The absence of a Free, Prior and Informed Consent process calls into question the validity of the assessment and contravenes recognised participatory

principles in decisions that affect cultural and environmental interests.

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has not published the full Social Impact Assessment despite having commissioned it, which has resulted in a significant evidential gap. This lack of transparency hinders both the public and the competent authority from gaining a comprehensive understanding of the social risks identified in the developer's own research. While summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity, the failure to disclose the complete assessment limits the ability to scrutinise these findings thoroughly.

Moreover, the proposal is viewed by some as a direct threat to community identity and cohesion, with the developer acknowledging “cultural loss” within their findings. Unfortunately, these critical impacts have not been adequately integrated into the main application or weighted appropriately. The absence of the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This situation undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may alter community character and functioning. The lack of a complete dataset means the application does not provide a full evidential basis for evaluating the balance between potential benefits and harms.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and avoid harm; however, available evidence

suggests existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy becomes unfeasible.

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

In conclusion, the combination of non-disclosure of the complete Social Impact Assessment and evidence of existing adverse impacts renders the assessment incomplete and unreliable. This inadequacy obstructs a lawful determination and leads to the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development, with its large-scale turbines near the West Lewis coastline, threatens to fundamentally alter the character of this region. This coastline is defined by its open Atlantic horizon, undeveloped character, and a profound sense of remoteness. The introduction of such industrial structures in close proximity to the shoreline would create a continuous and overwhelming presence that would result in a permanent and irreversible transformation of the landscape.

The assessment provided does not adequately represent the scale of the visual change that would occur. The turbines' height and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The significance of this impact is not properly conveyed within the current assessment, leaving a considerable gap in understanding the effect on this sensitive landscape.

Moreover, there are serious methodological concerns regarding the selection of visual viewpoints. It appears that some viewpoints may fail to fully capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationship between seascape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these connections, altering how heritage assets are experienced and disrupting their relationship with the natural horizon. This transformation represents not just a visual impact, but also a broader cultural and spatial harm that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal conflicts directly with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The proposed scale of change is incompatible with the necessary protection of landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

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

In conclusion, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and confirm that the proposal is incompatible with the protection of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks in this application is lacking. It does not provide the necessary detail to evaluate the likely environmental effects. The proposal entails significant seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are set to be formulated after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is alarming, especially considering the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on how these will be prevented, controlled, or monitored.

There is also uncertainty concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without strong modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty includes potential effects on marine species and habitats already identified 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 fails to allow for a proper evaluation of whether suitable safeguards are in place to deal with pollution events. This creates procedural risks and undermines the capacity of the competent authority to review environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted; without this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The evaluation of the proposal's impacts on fisheries and marine life is inadequate, lacking a comprehensive assessment of both ecological and socio-economic factors. The waters along the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not convincingly show that these vital habitats and fishing activities will be preserved without significant disruption.

A significant concern is the presumption that fishing activities can be shifted without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from this displacement. This gap is crucial, as it raises the risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and well-substantiated evaluation, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses serious risks to marine species, particularly due to underwater noise associated with construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances that could affect a wide range of species, including dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimizes these impacts without adequate evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction raises serious questions regarding compliance with the Habitats Regulations, especially since harm is expected at a level that necessitates legal authorisation.

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 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 alignment with the National Planning Framework 4 or the National Marine Plan. It does not sufficiently establish that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thereby preventing any conclusion that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a comprehensive assessment of the onshore infrastructure, leading to an incomplete understanding of its environmental and socio-economic impacts. The offshore turbines and the onshore works are fundamentally connected, yet they are evaluated separately, resulting in a fragmented analysis that obscures the overall scale of the project's effects.

Onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is a vital carbon store and ecologically sensitive area. By not fully assessing these impacts, the application fails to provide a clear picture of the project's environmental footprint.

Exclusion or deferral of the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered collectively. However, by treating offshore and onshore elements as distinct, the project does not adequately address the combined effects on peatlands, habitats, and local communities.

There are also considerable risks to sensitive habitats, including machair systems and peatland environments, both of which are protected by policy. The application does not clearly demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures are in place, creating a significant gap regarding biodiversity protection.

The project raises serious concerns about carbon balance. The disturbance of peatland releases stored carbon, which could lead to a carbon debt that undermines the goals of renewable energy initiatives. The application does not sufficiently tackle this concern or prove that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. There is no evidence in the application that necessary consents or processes have been initiated, leading to doubts about the

project's deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which would be visible over considerable distances, threatens to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

This application fails to evaluate the potential impacts of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the region's identity and the emerging sectors of tourism, such as astro-tourism. Consequently, there exists a notable gap in the overall landscape and environmental assessment due to these omissions.

Moreover, there has been no evaluation of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can lead to disorientation and increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, thereby neglecting to consider how aviation lighting may negatively affect these species or contribute to increased mortality rates.

This shortcoming is further aggravated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The absence of site-specific night-time data results in a critical gap in understanding the ecological impacts that the proposal may have.

Without a thorough assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would experience adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and prevents a lawful determination of the application.

From a policy standpoint, the lack of evaluation contradicts National Planning Framework 4 regarding the preservation of natural environments and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time forms an essential part of the environment.

In summary, the complete lack of assessment regarding 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 unfit for supporting a lawful determination.

TOURISM

The assessment of tourism impacts is critically inadequate, failing to analyse the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it neglects to provide any quantitative analysis regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution from tourism.

The economic significance of tourism has been notable, with growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not address how the industrialisation of the seascape and deterioration of environmental quality might affect the Tourism Gross Value Added or the broader economic resilience. In the absence of this analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an established and expanding sector.

The omission of a Dark Skies Assessment further exacerbates the issue, as it overlooks the critical role of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are integral to visitor experiences and the burgeoning markets of nature-based tourism and astro-tourism. This lack of consideration highlights a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefit. It contradicts strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental influences on visitor behaviour, and acknowledge the economic dependency of the island culminates in a significant evidential void. This hinders a thorough evaluation of economic effects and supports the assertion that the application remains incomplete.

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 standards. The application mirrors the main concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not sufficiently address these critical issues.

There are significant gaps in the baseline data provided, and the application relies on an undefined design envelope. Furthermore, it depends on unspecified mitigation measures and fails to include essential impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism consequences. Consequently, the Environmental Impact Assessment is lacking, which hinders a full understanding of potential significant effects or residual impacts.

Procedural shortcomings are also evident, particularly with the absence of a compliant Island Communities Impact Assessment, which breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

The environmental risks associated with the proposal remain uncertain and potentially severe. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidence required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either denies consent based on these grounds or invokes the relevant regulatory provisions to require the submission of the missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

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: 770C9A84

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the scale, proximity, and design of the development raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient, lacking a complete, transparent, and reliable evaluation of the environmental effects anticipated from the proposal. The employment of a flexible Project Design Envelope, which does not

commit to specific dimensions, layouts, or configurations for the turbines, introduces a considerable degree of uncertainty. This uncertainty hampers the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts detailed may not accurately represent the development that is ultimately realised, which prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This request for consent implies that environmental harm will be managed subsequently, hindering any meaningful evaluation of the effectiveness of such measures and assessment of residual impacts. Deferring crucial information to stages after consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established prior to any determination.

There exist substantial evidential deficiencies, including gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty surrounding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the combination of reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects and mean that the competent authority cannot adjudicate the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application exhibits significant shortcomings in the assessment of alternatives, failing to meet the statutory obligations of the Environmental Impact Assessment regime. It does not offer a structured and reasoned comparison of realistic alternatives based on their environmental impacts. Instead, it presents a narrative detailing the evolution of the project, which does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging alternatives.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not illustrate that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. This is particularly pertinent given the sensitivity of the West Lewis coastline and the critical role that distance from the shore plays in determining impact. The failure to provide such analysis obstructs any conclusion that the proposed location constitutes the least damaging choice.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance, coupled with the absence of comparative analysis, indicates that mitigation by design has not been effectively implemented, resulting in an overreliance on post-design mitigation measures.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority from ascertaining whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal is sustainable or aligns with policy requirements.

From a policy viewpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community well-being. The absence of a structured and comparative assessment is a significant omission that reinforces the overall conclusion that the application has not been adequately evaluated and does not warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is inadequate, lacking a comprehensive and reliable understanding of the ecological receptors within the West Lewis coastal environment. This region is a sensitive and biologically rich marine area, yet the baseline data provided is insufficient. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to establish a solid evidential foundation for evaluating potential impacts.

One significant gap involves otters, a European Protected Species. The application does not properly acknowledge or assess their active use of coastal areas for foraging and movement. Without considering their core foraging range and behaviour, the assessment inadequately evaluates the potential effects of construction disturbances,

noise, and increased activity. This failure undermines any conclusions drawn regarding the lack of significant effects on otters.

There are also notable shortcomings in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The neglect to integrate or appropriately assess such data leads to an incomplete baseline and weakens the reliability of the conclusions.

These methodological flaws result in conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. Additionally, the absence of adequate baseline data hampers a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and interactions within the broader ecosystem. This creates uncertainty about the real risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to adequately identify or assess protected species. The level of uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application fails to establish to the required evidential standard that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. This development is situated within key foraging areas and migratory pathways; however, the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer asserts that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises concerns about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the underlying evidence. Moreover, the assessment lacks sufficient proof that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully addressed, and the reliance on modelling methods

introduces uncertainty, particularly for species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not comprehensively understood.

The placement of turbines within a recognised migratory corridor presents an additional and significant risk, effectively creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality within this corridor or the potential impacts on species that have relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there is 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 satisfied. This engages the precautionary principle and precludes a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents significant shortcomings in the assessment of cultural heritage and community identity. It overlooks the West Lewis coastline as a dynamic cultural landscape, where environment, language, tradition, and community are interwoven. Instead of recognising heritage as a living entity, it is treated as a collection of separate, unchanging assets, ignoring their ongoing relevance in social, cultural, and spiritual contexts.

The treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, reveals another key weakness. These locations are not merely historical; they are active burial sites and places of spiritual significance. However, the assessment reduces them to static features, failing to acknowledge their current use and the implications of development on their surroundings. This misrepresentation leads to a partial understanding of cultural impacts and dismisses their importance to community life.

Furthermore, the assessment neglects intangible cultural heritage, including aspects such as the Gaelic language and local traditions. The strong connection between the community and its coastal environment is not addressed, despite being crucial to the area's identity. This omission hinders a complete understanding of the development's cultural impact.

Community rights and engagement are also inadequately addressed. The Gaelic-speaking population has a unique cultural identity, recognised as that of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the assessment's legitimacy and fails to honour established participatory principles in matters concerning cultural and environmental interests.

Additionally, there is a critical absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to properly evaluate the social, cultural, and economic consequences for the island community. This omission alone compromises the legality of the determination process.

From a policy standpoint, these gaps conflict with the National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, marks a clear deviation from necessary policy guidelines.

In conclusion, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations result in a notable evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application lacks a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development suffers from a significant lack of transparency concerning its social impacts, health, and wellbeing assessments. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This omission results in a substantial evidential gap, hindering both the public and the competent authority from fully understanding the social risks identified in the developer's research.

Available summaries suggest that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been gathered through direct engagement, therefore are not speculative in nature. However, the failure to disclose the full assessment restricts proper scrutiny of its findings and limits the capacity to gauge their significance in the decision-making process.

Evidence indicates that the proposal is seen as a direct threat to community identity

and cohesion, with the developer's own findings highlighting "cultural loss." Despite this, such impacts have not been adequately integrated into the main application nor given appropriate consideration. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The absence of the complete dataset means the application does not provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application fails to prove compliance with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy cannot be demonstrated.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development threatens the West Lewis coastline, characterised by its open Atlantic horizon and a sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, permanently altering the landscape and its natural character. This change is not merely visual but fundamentally transformative, undermining the very essence of what makes this area special.

The application fails to accurately convey the extent of the visual change. The sheer scale and proximity of the turbines would dominate views from residential areas and historic sites, significantly impacting visual amenity and eroding the qualities of naturalness and remoteness that define the region. Such oversight in the assessment neglects the profound significance of this impact within such a sensitive landscape.

Concerns arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural

heritage sites and high-value landscapes. This raises questions about the reliability of the assessment and whether it truly captures the magnitude of the visual impact.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been appropriately assessed. Prominent sites such as the Calanais Standing Stones are integral to the wider landscape, interlinked with the Atlantic horizon both visually and spatially. By treating these assets as isolated, the assessment overlooks their interdependence and the impacts on their cultural significance.

The industrialisation of the seascape would disrupt the context in which these heritage assets are experienced, severing their connection to the natural horizon. This transformation represents not just a visual impact but a broader cultural and spatial harm that remains unexamined within the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4 regarding the protection of natural and historic assets. The scale of the proposed changes fails to meet the requirements to safeguard landscape character and visual amenity, as well as the settings of culturally significant sites. The lack of a thorough worst-case assessment further casts doubt on the proposal's compliance with established policies.

Lastly, it is evident that the impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure that their presence is dominant and unavoidable, resulting in changes that are fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These significant deficiencies highlight the proposal's incompatibility with the preservation of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of pollution and construction risks related to the proposal is fundamentally lacking in detail, hindering any evaluation of potential environmental effects. Notably, the project entails extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. The application relies on undefined mitigation and contingency measures that are intended to be formulated post-consent, which severely limits the opportunity for a meaningful assessment of their adequacy or potential effectiveness.

This reliance on unspecified future measures is especially troubling due to the sensitive nature of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide

adequate detail on strategies to prevent, control, or monitor these risks.

Moreover, there remains significant uncertainty regarding the scale and behaviour of sediment plumes that may result from the proposed seabed disturbance and cable installation. In the absence of comprehensive modelling and clearly outlined management strategies, the extent, duration, and ecological consequences of these impacts cannot be accurately assessed. This uncertainty extends to the potential effects on marine species and habitats identified as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether effective safeguards are in place to address potential pollution events. This not only introduces procedural risks but also undermines the ability of the competent authority to thoroughly assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Assessments of likely significant effects and their corresponding mitigation measures must occur prior to granting consent. The absence of this critical information undermines the legality of the determination process. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, which is crucial given the diverse marine ecosystem and active fishing industry off the West Lewis coast. There is a failure to demonstrate that these important habitats and uses can be preserved without substantial disruption. A key concern arises from the unfounded assumption that fishing activities can be displaced without adverse effects. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure. This significant omission raises the risk of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. Without a clear, evidence-based evaluation, the implications for both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling

anticipated over an extended period is expected to disturb a wide area, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There is an evident contradiction within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially when harm is anticipated to a level that requires legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts arising from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders the ability to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to show that the proposed development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the project represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current proposal involves significant onshore infrastructure as part of a single integrated project that has been assessed incompletely. The offshore turbines and onshore works are interconnected, yet they have been evaluated separately, leading to a fragmented analysis that conceals the true extent of environmental and socio-economic impacts.

Among the onshore components are cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically fragile habitat. The application fails to offer a thorough assessment of these impacts, hindering a comprehensive understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact

Assessment process mandates that all aspects of a project be considered collectively; however, the division between offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain unclear.

There are notable risks to delicate habitats, including machair systems and peatland environments, which receive policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This indicates a clear lack of evidence concerning biodiversity protection.

Furthermore, the routing of the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence that the required consents or processes have been commenced, which raises concerns about the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it lacks consideration of dark skies and nocturnal wildlife, which are crucial elements of the West Lewis coastline's environmental quality and cultural identity. The area's exceptionally dark skies contribute significantly to its tourism value, yet the proposal introduces permanent red aviation lighting that creates an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Additionally, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This oversight is particularly concerning given the rising significance of dark skies in promoting emerging tourism sectors like astro-tourism. The lack of a comprehensive assessment regarding these aspects represents a significant gap in the landscape and environmental evaluation.

Moreover, there is an absence of analysis regarding the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and increased risks of collision. The proposal does not encompass any impact assessment related to lighting or phototaxis.

studies, leaving an unaddressed question regarding how such aviation lighting may endanger these species or contribute to their mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates the issue, as it overlooks nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, but this risk has not been evaluated. The lack of site-specific night-time data creates a critical shortfall in comprehending the ecological impacts involved.

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

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, they undermine the overall assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

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

TOURISM

The evaluation of tourism impacts within the application is severely lacking and does not adequately assess the economic and social repercussions for a critical sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the sense of remoteness they provide. While the application notes that 86% of visitors are attracted by the scenery, it fails to deliver a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced considerable growth, with revenue rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Nonetheless, the proposal does not consider how the industrialisation of the seascape and degradation of environmental quality may affect Tourism Gross Value Added or the broader economic resilience of the area. Without such modelling, it is impossible to ascertain whether the development would provide a net economic benefit or adversely impact a well-established and expanding sector.

Furthermore, the assessment neglects to examine the significance of environmental quality for tourism, particularly regarding the value of unspoiled landscapes and dark

skies to the visitor experience. This is especially relevant for growing sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable shortfall in understanding the implications for an acknowledged and emerging facet of the local economy.

Considering that the island community possesses limited economic diversity, the oversight in assessing tourism impacts carries broader consequences 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 properly evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector and fails to present sufficient evidence for the competent authority to analyse the economic ramifications of the proposal.

In summary, the collective shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency create a significant evidential gap. This inhibits a comprehensive assessment of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

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

There are critical gaps in the evidential basis provided for this application, including incomplete baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways such as effects on nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to offer a comprehensive understanding of the likely significant effects or residual impacts.

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

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

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

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

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

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

Additional Comments

I live in Dalbeg on the Isle of Lewis. A lot of my time is spent looking out of my windows staring at the sea. It gives me an enormous sense of well being gazing towards the horizon. To think that there's nothing at all but water until you reach Canada makes me feel small but also safe and connected to this planet that we live on. That may sound daft and self centered but disturbs me greatly that this untainted view is, potentially, going to be lost. And for what? Green Energy? Net Zero? No! For profit! That is what this is all about. The Council and local businesses might be excited about the promise of an influx of outside contractors coming to the island but when they've gone, what will we have? Cheaper energy? I doubt it! All we'll have is something we'll regret and can no longer do anything about. My children will have to grow up watching the turbine from the beach, from their school playground, from the football pitch. Just about everywhere they go they'll be able to see them and hear them. That makes me so sad. And me? I'll probably still look out to the sea, but instead of feeling happy, safe, and connected, I'll forever feel anger and shame towards the people who have done this to us.

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: DA95D8CE

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The application raises significant concerns due to its scale, proximity to the shoreline, and design, which challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A thorough review of the Environmental Impact Assessment Report and supporting documentation reveals that the application does not provide an adequate evidential basis for a lawful determination. There are critical gaps in environmental data, and the baseline information is both limited and inconsistent. Moreover, many key aspects of the proposal remain undefined. The flexible design framework employed by the developers hinders a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures prevents a proper assessment of their effectiveness. Consequently, the documentation does not offer a comprehensive understanding of the potential environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial policy conflicts inherent in the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate that it can meet national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts undermine the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, introduces serious concerns about landscape capacity, visual dominance, and overall environmental impact. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is apparent that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be invoked.

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 application presents significant deficiencies in the assessment of marine ecology and protected species, failing to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the provided baseline data remains incomplete. Moreover, the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of various species.

Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A critical gap exists regarding otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. The omission of their core foraging range and behavioural patterns leads to an insufficient assessment of how construction disturbances, noise, and increased activity might affect them. This oversight undermines the conclusions drawn about the absence of significant effects on this species.

The evaluation of basking sharks also reveals shortcomings, as it relies on aerial surveys that introduce a substantial detection bias, particularly under Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that suggest these waters are frequently used by the species. Neglecting to incorporate or adequately consider such data contributes to an incomplete baseline, ultimately weakening the reliability of the conclusions made.

These methodological flaws imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data further hampers the ability to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This raises uncertainty about the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements outlined by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been an inadequate identification or assessment of protected species. This uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Given these circumstances, granting consent would not be lawful.

In summary, the combined issues of incomplete baseline data, flawed methodologies, and unsupported conclusions lead to an assessment that is fundamentally unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application contains significant flaws in the ornithological assessment, which features gaps in evidence and inconsistencies that undermine its findings. It is critical to note that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application does not satisfactorily demonstrate that these species will remain unaffected by the proposed development. The development site is situated in key foraging areas and

migratory pathways, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A core contradiction arises within the application, where the developer asserts there will be no significant adverse effects while also putting forth a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises concerns about the validity of the assessment and suggests that the conclusions drawn are not backed by adequate evidence. The report lacks sufficient evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be affected. The significance of these vital feeding grounds is not fully recognised, and the reliance on modelling methods introduces uncertainty, especially for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and behavioural responses are not well understood.

Additionally, placing turbines within a recognised migratory corridor poses another significant risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term impacts of ongoing mortality within this corridor or the potential consequences for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle and obstructs a lawful conclusion in favour of consent.

Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these issues render the assessment unreliable due to inconsistencies, methodological flaws, and inadequate evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal in question fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the

cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice. However, the assessment categorises them as static features, neglecting their continued use, meaning, and the impact that the proposed development would have on their setting. This mischaracterisation leads to an inadequate evaluation of the cultural effects and overlooks their important role in community life.

The assessment also fails to take into account intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity yet are completely omitted from the assessment, representing a significant oversight. Without addressing these factors, it is impossible to truly understand the cultural impact of the development.

Moreover, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity that aligns with recognised characteristics of an Indigenous People, yet no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement undermines the validity of the assessment and disregards established principles of participation in decisions that affect cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application does not offer a sufficient foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing raises serious concerns about the evaluation's validity. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the complete report has not been made available, creating a significant gap in evidence. This absence of information obstructs both public understanding and the competent authority's ability to assess the social risks identified by the developer's own research.

Existing summaries reveal that residents are facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposal. These findings stem from direct community engagement rather than speculation. Nevertheless, the failure to disclose the entire assessment hampers scrutiny of the results and limits the capacity to ascertain their relevance within the decision-making process.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. However, these impacts have not been adequately incorporated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the actual social and human costs associated with the development.

This transparency issue undermines the Environmental Impact Assessment process. Understanding the social, economic, and health implications is crucial for projects of this magnitude, particularly when community character and functioning may be influenced. The application's failure to provide the full dataset means it lacks a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet current evidence suggests existing negative effects have not been fully revealed. Without the complete assessment, compliance with this policy cannot be verified.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, makes the assessment incomplete and unreliable. This situation hinders lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the seascape, landscape, and visual impacts is significantly inadequate, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, possesses a profound sense of remoteness. The proposed installation of large-scale turbines near the shoreline would impose a continuous industrial presence that fundamentally alters this unique character, leading to a permanent and irreversible transformation of the landscape.

The application lacks an adequate representation of the magnitude of the visual changes that would occur. The size and proximity of the turbines would dominate views

from residential areas, historical sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impacts have been underestimated, which further compromises the validity of the assessment.

A critical shortcoming is the failure to recognise the interconnected relationship between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, connected visually and spatially to the Atlantic horizon. The assessment approaches these heritage assets as isolated entities, neglecting their interdependence and leading to an incomplete evaluation of the 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 connections to the natural horizon. This constitutes not only a visual impact but also inflicts broader cultural and spatial damage that has not been sufficiently assessed within the application.

From a policy perspective, the proposal is at odds with National Planning Framework 4, which seeks to protect natural places and historic assets. The anticipated scale of change is inconsistent with the need to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any claims of compliance with policy requirements.

It is also evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in an unavoidable and dominant presence. The changes involved are fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast support a diverse marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life related to the proposal is inadequate, failing to provide a solid evaluation of the ecological and socio-economic impacts. The application does not establish that these vital uses and

habitats can be protected or maintained without significant disruption.

A critical concern is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or able to sustain additional pressure. This significant oversight raises the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. Extended high-energy hammer piling is expected to cause disturbances across large distances, affecting species such as dolphins. The anticipated disruption to a substantial portion of the local bottlenose dolphin population is alarming, yet the application minimises the severity of these impacts, lacking adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged even while impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment does not adequately address cumulative impacts from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed infrastructure is significantly deficient, failing to acknowledge the comprehensive impacts stemming from a project that is fundamentally integrated. The offshore turbines are interconnected with the onshore operations, yet the two are evaluated in isolation, leading to a disjointed understanding that masks the overall environmental and socio-economic ramifications.

The onshore components encompass cabling that traverses protected moorland, the

construction of a substation in proximity to Stornoway, and the development of necessary access routes through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, which serves as a critical carbon repository and an ecologically fragile environment. Without an exhaustive evaluation of these impacts, a full comprehension of the project's environmental footprint remains elusive.

Moreover, the omission or postponement of onshore impact assessments obstructs a thorough appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all facets of a project should be assessed collectively; however, the distinct treatment of offshore and onshore components results in a lack of clarity regarding the combined repercussions on peatlands, habitats, and local communities.

There are grave concerns surrounding the potential risks to sensitive habitats, including machair systems and peatland environments that are under policy protection. The application does not sufficiently demonstrate that these impacts have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential void in relation to biodiversity safeguarding.

Additionally, the routing of infrastructure through active croft land raises possible conflicts with existing land use and legal rights. The application lacks evidence that requisite consents or processes have been pursued, bringing into question the feasibility and lawful execution of the project.

From a policy standpoint, the disjointed assessment of the project and the failure to show protection for peatlands, habitats, and land use interests contravene the principles outlined in the National Marine Plan and National Planning Framework 4. The inability to illustrate that impacts can be circumvented or mitigated further undermines the validity of the application.

Collectively, the fragmentation of project components, the absence of a thorough assessment, and the lack of supporting evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant alteration poses immediate risks that have not been adequately addressed.

Crucially, the assessment fails to evaluate the impact of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can cause

disorientation and increase collision risks. The application lacks any lighting impact assessment or phototaxis study, leading to a failure in evaluating how aviation lighting may affect these species or escalate mortality rates.

Moreover, the ornithological assessment is overly reliant on daytime survey data, neglecting the nocturnal activity and associated risks that species such as Kittiwakes face, particularly as they forage or migrate at night. This oversight creates a significant gap in understanding the ecological impacts, as site-specific night-time data has not been collected.

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

From a policy standpoint, the absence of an assessment concerning dark skies and nocturnal wildlife contradicts National Planning Framework 4, which emphasises the protection of natural spaces and environmental quality. This omission also undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment.

Overall, the lack of any evaluation regarding dark skies and nocturnal wildlife represents a significant evidential gap. The application is incomplete and incapable of supporting a lawful determination due to the absence of baseline data, impact modelling, and species-specific analysis. Immediate action is required to address these critical omissions.

TOURISM

The application does not adequately assess the potential impacts on tourism, a vital sector for the Isle of Lewis economy. With tourism reliant on the area's stunning coastline, unspoiled landscapes, dark skies, and sense of remoteness, the omission of a thorough evaluation of how large-scale offshore infrastructure could affect visitor numbers, behaviours, and the overall economic contribution is concerning. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis provided.

Tourism on the Isle of Lewis has seen substantial growth, increasing from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not explore how the industrialisation of the seascape and the degradation of environmental quality may impact the Tourism Gross Value Added or the resilience of the broader economy. Such an analysis is crucial to ascertain whether the proposed development would yield a net economic benefit or potentially jeopardise this established sector.

Furthermore, the application overlooks the critical role environmental quality plays in

supporting tourism. The significance of unspoiled landscapes and dark skies to the visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism, are inadequately addressed. The lack of a Dark Skies Assessment exacerbates this gap, failing to provide a comprehensive understanding of the implications for a recognised and growing segment of the local economy.

In an island community where economic diversification is limited, the failure to properly evaluate tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been considered, contravening the requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impacts and the necessity of showing a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to thoroughly assess the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, examine the environmental factors influencing visitor behaviour, and recognise the island's economic reliance culminates in a significant evidential gap. This hinders a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

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

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

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

Additional Comments

I am quite frankly dumbfounded that a proposed development of this size has even got this far. It is truly totally inappropriate in fact insane to place this huge development in this area- in fact any area around this beautiful Highlands and Islands. Not only will it impact the delicate ecosystem, it will truly overpower this area. It will destroy fishing and tourism and ruin lives . Please throw this out to the scrap heap- it is totally wrong- actually criminal.

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: C41189C2

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies across various domains, including planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application does not present a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, important elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are significant 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, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests required for consent and impair the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises considerable concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance suggests that the application is incomplete and unable to facilitate a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to deliver a complete, transparent, or trustworthy account of the probable environmental effects of the proposal. The introduction of a flexible Project Design Envelope, without clear commitments to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that will ultimately be constructed, which inhibits both the public and the competent authority from fully grasping the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed at a later stage hampers any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation measures are clearly established before determination.

In addition, significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with 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 engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including aspects related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

When considered collectively, the dependence on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and rigorous assessment of environmental effects and mean that the competent authority cannot make a determination based on the information provided.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the development is significantly lacking in transparency and substance. Although the developer commissioned a Social Impact Assessment that included local resident

focus groups, the full report has not been made available. This omission creates a critical evidential gap, limiting public understanding and hindering the competent authority's ability to evaluate the social risks identified in the developer's own research.

Summaries that are available indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are the result of direct engagement with the community and are not based on speculation. However, the absence of the complete assessment restricts thorough scrutiny of these findings and undermines efforts to assess their significance during the decision-making process.

Moreover, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with the developer's findings indicating a risk of "cultural loss." Despite these serious concerns, the full impacts have not been adequately addressed in the main application, nor have they been given the appropriate consideration. The failure to disclose the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is vital, particularly when community character and functioning might be affected. The failure to provide the complete data set results in the application lacking a solid evidential foundation necessary for weighing the benefits against potential harms.

From a policy viewpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm. The evidence currently available suggests existing adverse effects that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is impossible.

Procedurally, the implications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a substantial omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing adverse effects, results in an incomplete and unreliable assessment. This situation hampers lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the environmental assessment related to construction and pollution risks. It lacks the necessary detail to effectively evaluate potential environmental impacts, particularly given that the West Lewis

coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. This sensitive environment necessitates well-defined Construction Environmental Management Plans and Pollution Prevention Plans, which are currently absent. Instead, the application relies on vague mitigation and contingency measures that are to be developed after consent is granted, obstructing any meaningful assessment of their potential effectiveness.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from the proposed seabed disturbance and cable installation. Without thorough modelling and clearly articulated management strategies, it is impossible to ascertain the extent and duration of these impacts, or their ecological ramifications. This uncertainty extends to sensitive marine species and habitats that have already been identified in broader assessments.

Additionally, the absence of detailed emergency response procedures compounds these issues. The deferral of essential contingency planning until after consent is granted hinders a proper evaluation of whether adequate safeguards are in place to address potential pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and potential mitigation are assessed prior to consent; if this crucial information is absent, a lawful determination cannot be achieved. The application also fails to demonstrate adherence to policy requirements regarding environmental protection and water quality.

Ultimately, the deficiencies in defined mitigation measures, the lack of comprehensive management plans, and the uncertainty surrounding potential impacts render the assessment materially insufficient. These flaws prevent a thorough evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Included in the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly on Barvas Moor, which serves as an important carbon

reservoir and an ecologically significant habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the project's total environmental footprint.

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

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

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

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

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

In summary, the division of project components, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thus impeding lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally unfit for determination due to significant procedural and substantive shortcomings. There is a clear lack of a comprehensive evidential basis, marked by critical gaps in baseline data and the continued use of an undefined design envelope. The reliance on unspecified mitigation measures, along with the omission of vital impact pathways such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This absence of reliable information

does not allow for a proper understanding of the likely significant effects or residual impacts.

Moreover, the absence of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a serious omission. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, further underscoring the application's inadequacies.

The proposal stands in direct opposition to National Planning Framework 4, failing to demonstrate sufficient protection of biodiversity, natural places, and cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit, largely due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been assessed appropriately, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals lead to inconsistencies that have not met the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing any lawful conclusion that impacts may be acceptable.

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

In summary, the extensive deficiencies in information, combined with policy conflicts and unresolved environmental risks, make the application untenable. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 93D818C4

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The design, proximity, and scale of the proposal raise serious questions about its alignment with statutory obligations, national policies, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful decision. There are gaps in critical environmental data, the baseline information provided is both limited and inconsistent, and many crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to allow for a comprehensive understanding of the environmental, cultural, or community implications, and the assertions of negligible or non-significant effects lack robust evidential support.

There are evident and significant policy discrepancies as well. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment guidelines, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to safeguard biodiversity, climate considerations, and environmental integrity are achievable. Such discrepancies directly impact the statutory tests needed for consent and compromise the ability of the competent authority to determine the proposal's acceptability under policy frameworks.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot substantiate a lawful determination. In light of these factors, the precautionary principle is imperative.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposed development lacks a thorough assessment of alternatives, failing to comply with the requirements of the Environmental Impact Assessment regime. Instead of a structured evaluation of realistic options based on their environmental impacts, the application presents a narrative about the evolution of the project. This approach does not adequately show that less harmful alternatives have been

identified, assessed, and preferred over more damaging solutions.

Furthermore, there is no clear, evidence-based comparison of alternative locations, scales of development, or design configurations. The application does not illustrate that the developer has genuinely considered placing turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis obstructs the conclusion that the proposed location is the least damaging.

These inadequacies extend to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to present a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation through design has not been applied, resulting in reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a breach of the established mitigation hierarchy and prevents the competent authority from determining whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be confirmed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this deficiency undermines alignment with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not undergone adequate evaluation and therefore cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment pertaining to marine ecology and protected species lacks completeness and reliability, failing to present a thorough understanding of ecological receptors in the West Lewis coastal environment, which is known for its biological sensitivity and activity. The methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species, leading to an insufficient evidential basis for evaluating potential impacts.

A significant gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their utilisation of coastal zones for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction disturbances, noise, and increased activity have not been sufficiently examined, thereby undermining any assertions about the absence of significant effects on this

species.

Deficiencies are also evident in the evaluation of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, which likely results in an underestimation of their presence, especially when compared with established land-based observations that demonstrate frequent usage of these waters. The failure to incorporate or thoroughly consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been adequately undertaken. The uncertainty introduced prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents serious concerns regarding its compliance with regulatory standards, particularly in relation to the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictions within the conclusions, along with data gaps and limitations in the modelling approaches, results in a failure to achieve the level of certainty required beyond reasonable scientific doubt. This inadequacy engages the precautionary principle, which raises significant legal issues regarding the validity of the application for consent.

Furthermore, the assessment lacks sufficient evidence to demonstrate that the internationally important seabird populations associated with protected areas such as the Lewis Peatlands and St Kilda will remain unaffected. The critical nature of these feeding grounds is not thoroughly addressed, and the reliance on modelling creates uncertainty, especially concerning declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly when baseline data is lacking and the behavioural responses of these species are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a

substantial risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment fails to adequately evaluate the long-term consequences of sustained mortality within this corridor and the potential impacts on species with small global populations.

The assessment as it stands is fundamentally flawed, riddled with internal inconsistencies and methodological weaknesses that undermine the reliability of its conclusions. These deficiencies prevent a thorough evaluation of the potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination. The implications of failing to protect biodiversity and natural assets under National Planning Framework 4 are clear, placing the proposal in direct opposition to national policy and raising urgent concerns about its overall validity.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development lacks adequate consideration of the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are interwoven. This application adopts an overly simplistic view, treating heritage merely as isolated assets rather than recognising their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the evaluation of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of development on their surroundings. Consequently, the assessment provides an incomplete picture of the cultural implications, disregarding the cemeteries' vital role in community life.

Moreover, the evaluation fails to address intangible cultural heritage elements, such as the Gaelic language and traditions, along with the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are conspicuously missing from the assessment, representing a serious oversight. Without acknowledging these factors, the development's cultural impact remains inadequately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies the characteristics of an Indigenous People, has not been afforded the Free, Prior and Informed Consent process. This lack of meaningful engagement undermines the credibility of the assessment and neglects established principles surrounding participation in decisions that affect cultural and environmental interests.

A significant procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to

examine the social, cultural, and economic effects on the island community, rendering any determination unlawful.

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

In summary, the failure to adequately evaluate living heritage, intangible cultural significance, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the proposed development have not been properly assessed, leaving the application without a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report remains unpublished. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified by the developer's own research. Summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, making them concrete rather than speculative. Nevertheless, the failure to disclose the entire assessment limits scrutiny of the findings and affects their significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Unfortunately, these impacts have not been adequately integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the actual human and social costs of the development.

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

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid causing harm, yet the available evidence indicates that there are existing adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be assured.

The procedural ramifications are substantial. The competent authority cannot conduct

a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material shortcoming within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed, lacking an adequate representation of the scale of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent and irreversible change to the landscape.

Moreover, the application fails to represent the magnitude of the anticipated visual alterations. The height and closeness of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would detrimentally affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately convey this impact or its importance within the context of such a sensitive landscape.

Concerns arise concerning the methodology employed in selecting and presenting visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or the most adverse scenarios, particularly in relation to significant cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the assessment's reliability.

Additionally, there is a notable shortcoming in the assessment's failure to acknowledge the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as separate entities rather than understanding their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural environments and historic assets. The proposed scale of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be successfully mitigated. Given the size, height, and proximity of the turbines, their presence would be overpowering and inescapable. Consequently, the resulting transformation is not merely capable of being reduced to an acceptable level through mitigation; it is fundamentally and permanently altering the landscape.

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

CONSTRUCTION AND POLLUTION RISKS

The reliance on undefined future measures raises significant concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. The proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, hindering any meaningful assessment of their adequacy or effectiveness.

The assessment of construction and pollution risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. The application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills but does not supply sufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures compounds these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the point of determination. From a regulatory perspective, the deferral of critical environmental

safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed prior to consent, and in the absence of this information, a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment surrounding fisheries and marine life associated with the proposal is inadequate and does not offer a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support a vital fishing industry. However, the application fails to adequately demonstrate that these habitats and uses can be preserved or maintained without causing significant disruption.

A critical concern is the presumption that fishing activities can be displaced without repercussions. There is no evidence provided within the application to suggest that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure. This lack of information is crucial, as the potential for displacement poses risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and evidence-based assessment, understanding the impacts on fisheries and livelihoods remains elusive.

Moreover, the proposal brings forth considerable risks to marine species, particularly due to the underwater noise produced during construction. The extensive high-energy hammer piling anticipated is likely to disrupt marine life over significant distances, with particular concern for species such as dolphins. The predicted disturbance affecting a large portion of the local bottlenose dolphin population is alarming, yet the application minimizes the importance of these effects, lacking adequate supporting evidence.

There exists a notable inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when harm is expected to a degree that warrants legal authorisation.

The assessment also neglects to evaluate the cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a holistic assessment of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove compliance with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable consequences for marine biodiversity, which inhibits any conclusion regarding the sustainability of the proposal.

In summary, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and internal contradictions collectively render the assessment incomplete and unreliable. These shortcomings obstruct a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and does not adequately address the full scope of impacts associated with what constitutes a single integrated project. The interconnected nature of the offshore turbines and onshore works is not reflected in the evaluation, which treats them separately, thereby obscuring the true extent of environmental and socio-economic consequences.

Significant onshore elements, including cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, traverse sensitive landscapes. These undertakings involve excavations in areas of deep peat, particularly in Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

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

The proposal raises additional serious concerns about sensitive habitats, such as machair systems and peatland environments, which are safeguarded by policy. The application does not convincingly demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been put in place. This results in a significant evidential gap concerning biodiversity protection.

Furthermore, the disturbance of peatland poses a risk to carbon balance, as it releases stored carbon and could lead to a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this critical issue and fails to show that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land also introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, raising serious concerns regarding

the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The exceptional darkness of the West Lewis coastline is a crucial aspect of its environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create an intrusive “wall of light” across the western horizon, fundamentally changing the night-time landscape.

Additionally, the application lacks any evaluation of how this lighting may impact visual amenity, landscape character, or the experiences of both residents and visitors. Given the essential role that dark skies play in the region’s identity and in emerging tourism sectors such as astro-tourism, this failure to address lighting impacts is particularly concerning. The resulting absence in the overall landscape and environmental assessment is marked.

Moreover, the proposal neglects to evaluate its effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, leading to potential disorientation and heightened risks of collision. The absence of a lighting impact assessment or a phototaxis study means the proposal does not properly consider how aviation lighting could adversely affect these species or contribute to increased mortality rates.

This lack of evaluation is exacerbated by reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal behaviours and the associated risks. Other species, such as Kittiwakes, which may forage or migrate during night hours, are equally susceptible to the disorienting effects of artificial lighting. Without site-specific data collected during night-time hours, there exists a critical gap in understanding the ecological impacts of the proposal.

It is impossible to ascertain whether any protected species or designated sites would suffer adverse effects in the absence of a thorough assessment of nocturnal impacts. The evidential standard necessary to exclude adverse effects beyond reasonable

scientific doubt is not met, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4, which emphasises the protection of natural environments and the maintenance of environmental quality. Furthermore, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is vital to the broader ecological context.

In summary, the complete lack of evaluation regarding dark skies and nocturnal wildlife leads to a substantial evidential deficiency. The omission of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of substantiating a lawful decision.

TOURISM

The assessment of tourism impacts presented in the application is significantly lacking, particularly in its failure to examine the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism, which heavily relies on the area's stunning coastline, almost untouched landscapes, dark skies, and sense of seclusion, has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Despite the application noting that 86% of visitors are attracted by the scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution from tourism.

Moreover, the application neglects to model the potential impacts of the industrialisation of the seascape and deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the area. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect this established and expanding sector.

The role of environmental quality in enhancing tourism is another critical oversight, as unspoiled landscapes and dark skies significantly contribute to the visitor experience, particularly in emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment amplifies this shortcoming, creating a considerable gap in understanding the effects on a vital and growing component of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts carries broader ramifications for employment, local enterprises, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been thoroughly evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary

demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and acknowledging the island's economic dependence result in a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the criteria of sustainable development when evaluated against statutory duties, national policy, and evidential requirements. It mirrors the critical issues associated with the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Fundamental to the assessment process is the lack of a comprehensive and reliable evidential foundation. The application reveals notable deficiencies in baseline data and continues to rely on an undefined design envelope. Moreover, it depends on mitigation measures that remain unspecified and fails to account for significant impact pathways, such as those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, obstructing a thorough understanding of probable significant effects or residual impacts.

There are also evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment represents a violation of statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These deficiencies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It fails to demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, does not substantiate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, thereby obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

The environmental risks remain uncertain and could potentially be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard

necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority is urged either to deny consent on these grounds or to invoke the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

This is a unique area in the world with unique views and wildlife which will all be spoiled beyond recognition. So very sad!

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: BA6F1A37

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with marine licensing and Environmental Impact Assessment protocols. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the proposal with statutory requirements, national policies, and the fundamental principles of sustainable development.

The application is deficient in its evidential foundation, lacking critical environmental data and presenting limited, inconsistent baseline information. Numerous aspects of the proposal are inadequately defined. The flexible design framework employed leads to ambiguities about the likely significant effects, and the reliance on unspecified mitigation measures precludes any meaningful assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the impacts on the environment, culture, or community. Assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, there are substantial conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations aimed at preserving biodiversity, addressing climate concerns, and maintaining environmental integrity. These conflicts directly affect the statutory criteria for consent and compromise the ability of the competent authority to determine the acceptability of the development within policy contexts.

The unprecedented scale of this proposal raises further issues, as large turbines are to be positioned very close to the shoreline, leading to significant concerns about landscape capacity, visual impact, and environmental repercussions. Overall, the combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary rigor and completeness, failing to deliver a full and transparent account of the potential environmental effects associated with the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces a high degree of uncertainty. This approach undermines the reliability of the assessment, as it is impossible to ascertain a worst-case scenario. As a result, the impacts presented may not accurately reflect the actual development, thereby preventing both the public and the competent authority from grasping the true extent of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under such conditions implies that any environmental harm will be addressed after approval, which obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation must be clearly established prior to any decision.

Additionally, there are considerable evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These issues contribute to uncertainty surrounding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of comprehensive information hampers a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not meet the evidential standards required by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This scenario triggers the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations relating to biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data culminate in an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings hinder a lawful and robust 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 assessment concerning marine ecology and protected species is inadequate and fails to deliver a complete or reliable understanding of the ecological receptors in the

West Lewis coastal area. This environment is sensitive and biologically active, yet the baseline data is lacking, and the methodologies used do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant shortfall is the treatment of otters, which are a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. This omission means that the core foraging range and behaviour of otters have not been considered, resulting in an inadequate evaluation of potential impacts from construction disturbance, noise, and increased activity. Therefore, the conclusions drawn regarding the absence of significant effects on this species are undermined.

There are also notable deficiencies in the evaluation of basking sharks. The reliance on aerial surveys creates a detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show these waters are frequently used by basking sharks. The lack of incorporation or proper consideration of such data leads to an incomplete baseline, which further weakens the reliability of the conclusions drawn.

Due to these methodological issues, conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The absence of adequate baseline data also hinders the meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the real risks faced by marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty that is introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, contributing to the conclusion that the application does not rest on a sufficiently evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted raises serious concerns regarding its reliability, primarily due to internal inconsistencies and methodological weaknesses. The development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. Despite this critical context, the application fails to meet the evidential threshold necessary to demonstrate that these species will not be adversely affected. It

does not adequately evaluate the implications of displacement, collision risk, or habitat loss, leaving significant gaps in evidence.

A fundamental contradiction arises within the application itself, as the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is anticipated, thus casting doubt on the validity of the assessment and its conclusions. Moreover, there is insufficient evidence provided that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is not fully considered, and reliance on modelling approaches contributes to uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate mortality rates, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents a further significant risk, effectively creating a barrier along a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The application does not sufficiently address 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 requirements needed to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, data gaps, and limitations inherent in the modelling render the standard of beyond reasonable scientific doubt unachievable. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion that would support consent.

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

In summary, the assessment is fundamentally flawed and cannot support the determination of the application due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

assessment hampers proper scrutiny of these findings and restricts an informed decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” recognised in the developer’s findings. Despite this acknowledgement, these significant impacts have not been adequately reflected in the main application. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, undermining the Environmental Impact Assessment process. Understanding the full range of social, economic, and health impacts is essential for developments of this magnitude, particularly when community character and functionality could be affected. The application, in failing to provide comprehensive data, does not present a complete evidential basis for weighing the benefits against potential harm.

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

The implications of this procedural deficiency are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This absence represents a material omission in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which is essential to its undeveloped character. The proposal for large-scale turbines in close proximity to the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The magnitude of visual change associated with this application is inadequately represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not fully capture the sensitivity of key cultural heritage sites or the worst-case scenarios, particularly concerning high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, which undermines the reliability of the assessment.

Furthermore, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape context linked to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital connections, disrupting how heritage assets are experienced in relation to the natural horizon. This represents not only a significant visual impact but also broader cultural and spatial harm that has not been adequately assessed.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application is materially deficient due to the absence of defined mitigation measures and a lack of detailed management plans, which collectively prevent a robust evaluation of construction and pollution risks. The assessment of these risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. This uncertainty extends to the potential effects on already identified sensitive marine species and habitats.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not contain fully developed Construction

Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined future measures to be developed post-consent, which raises significant concerns given the sensitivity of the receiving environment. The West Lewis coastline supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to assess environmental protection measures at the point of determination. This introduces procedural risk that further complicates the evaluation of appropriate safeguards to respond to pollution events.

From a regulatory standpoint, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed prior to consent; the absence of this information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality. Taken as a whole, these shortcomings reinforce the conclusion that the application is incomplete and unfit for approval.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. Unfortunately, the application does not adequately demonstrate how these essential uses and habitats will be safeguarded against significant disruption. The assessment of fisheries and marine life is lacking, failing to provide a thorough evaluation of the ecological or socio-economic impacts.

One major concern is the assumption that fishing activities can be displaced without any repercussions. The application does not present evidence that there are alternative fishing grounds that are accessible or capable of bearing the additional pressure. This critical omission raises serious questions, as such displacement could lead to overfishing in other areas, which may have broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based examination, the potential impacts on fisheries and local livelihoods remain obscured.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated by construction activities. The prolonged use of high-energy hammer piling is likely to disturb marine life over significant distances, affecting species including dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application downplays the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency in the application regarding the need for licences

to permit harm to European Protected Species, which is acknowledged, while simultaneously classifying impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to occur at levels that warrant legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not illustrate that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal represents sustainable development.

The deficiencies in the assessment, particularly concerning fishing displacement, underestimation of acoustic impacts, and internal inconsistencies, render it incomplete and unreliable. These shortcomings impede a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure remains notably incomplete and fails to acknowledge the full extent of impacts resulting from a single integrated project. The offshore turbines and onshore works are inherently connected, yet they are evaluated separately, leading to a fragmented assessment that obscures the true scale of environmental and socio-economic consequences.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, thus hindering a comprehensive understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively, yet the division of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application fails to prove that the impacts on these habitats have been adequately assessed or that suitable

avoidance measures have been taken. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. The disturbance of peatland releases stored carbon, which could create a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently tackle this issue or show that the overall carbon balance remains beneficial.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

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

In summary, the separation of project components, the absence of a thorough assessment, and the lack of evidence concerning environmental and land use impacts render this segment of the application incomplete and unreliable, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the region's environmental quality, cultural identity, and tourism value. The proposed installation of permanent red aviation lighting, which will be visible over long distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This omission is particularly concerning given the importance of dark skies to the area's identity and the potential growth of tourism sectors such as astro-tourism. The lack of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental assessment.

The absence of an evaluation regarding the effects of artificial lighting on nocturnal wildlife raises further concerns. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial light due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not incorporate any assessment of lighting impacts or conduct a phototaxis study, thus failing to determine how aviation lighting may affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Species like Kittiwakes, which might forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a substantial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and obstructs a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4's focus on safeguarding natural places and maintaining environmental quality. It also diminishes the broader evaluation of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Overall, the lack of any assessment of dark skies and nocturnal wildlife represents a considerable evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unable to support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties and national policy. This application echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains inadequate.

There is a notable lack of a complete and reliable evidential basis for determination. Critical gaps in baseline data persist, and the application relies on an undefined design envelope and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, preventing a full understanding of likely significant effects or residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to show acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore elements have not been assessed properly, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing any lawful conclusion about the acceptability of impacts.

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

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

A formal request is therefore made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

I have concerns regarding how this will impact wildlife, birds and sea life. It is potentially going to destroy the beautiful sea views across the west side of the island.

In addition the island doesn't have the infrastructure to accommodate the number of people who are going to work on the wind farms. As somebody who works in the hospital, the hospital is already running at full capacity most of the time and a lack of hospital beds. Most departments in the hospital are understaffed and stretched without extra thousands of people on the island.

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: 871808EA

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application relies on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and undermines the integrity of the Environmental Impact Assessment Report, preventing a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that could ultimately be constructed. This obscures the true extent of environmental effects, preventing both the public and the competent authority from having a clear understanding.

There are considerable evidential deficiencies, including insufficient baseline data, limitations in the methodology, and an overreliance on assumptions rather than site-specific evidence. This lack of robust supporting data results in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory requirements.

The application seeks consent based on the promise of addressing environmental harm through unspecified mitigation measures, monitoring strategies, and management plans at a later stage. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's requirement that significant effects and mitigation measures are established before determination.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, it fails to demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

In summary, the combination of relying on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These significant deficiencies hinder a lawful and robust assessment of environmental effects, meaning the competent authority cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a severely deficient assessment of marine ecology and protected species, failing to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is known to be highly sensitive and biologically active, yet the baseline data remains incomplete. Furthermore, the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment lacks a

solid evidential basis for evaluating potential impacts.

A notable shortcoming involves otters, classified as a European Protected Species. The application inadequately addresses their active foraging and movement within coastal areas. This neglect of their core foraging range and behavioural patterns raises concerns about the potential effects of construction disturbance, noise, and increased activity, which have not been sufficiently evaluated. Such oversights undermine any assertions regarding the lack of significant effects on this species.

The evaluation of basking sharks also reveals significant deficiencies, particularly due to an over-reliance on aerial surveys that introduce notable detection bias, especially under Atlantic conditions. This methodology likely underestimates the sharks' presence, especially when compared to established land-based observations that indicate these waters are frequently used by them. The failure to properly consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data prevents a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risks posed to marine species and habitats.

Regulatory scrutiny reveals that the application does not satisfy the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. The failure to properly identify or assess protected species introduces a level of uncertainty that precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In such circumstances, the law does not permit consent to be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented in the application is fundamentally flawed, featuring significant evidence gaps and internal contradictions that compromise its conclusions. The assessment fails to adequately demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Key foraging areas and migratory pathways are located within the development site, yet the implications of displacement, collision risk, and habitat loss are not thoroughly evaluated.

A notable inconsistency arises from the developer's assertion of no significant adverse

effects alongside the advancement of a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This contradiction raises questions regarding the assessment's reliability and suggests that the conclusions drawn lack robust support from the underlying evidence. Moreover, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The crucial nature of these feeding grounds is insufficiently acknowledged, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Given that baseline data is often incomplete and behavioural responses remain poorly understood, the methodologies employed are likely to underestimate potential mortality rates.

Furthermore, the placement of turbines within a recognised migratory corridor presents an additional and serious risk. This positioning effectively obstructs a primary flight path used by birds migrating between the United Kingdom and Iceland. The application inadequately addresses the long-term consequences of continued mortality in this corridor or the impacts on species with limited global populations.

From a regulatory standpoint, the application does not satisfy the evidential standards necessary to ascertain no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling limitations, fails to meet the requisite standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and obstructs a lawful conclusion supporting consent.

The identified deficiencies also indicate non-compliance with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected positions the proposal directly against national policy. Collectively, these flaws render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings hinder a thorough evaluation of impacts and culminate in the overall conclusion that the application does not fulfill the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, notably neglecting the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising heritage as a living element that serves ongoing social, cultural, and spiritual purposes within the community, the application presents it as a collection of isolated, static assets.

There is a critical shortcoming in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet the assessment views them merely as static features. This

oversight fails to consider their continued use and meaning, as well as the potential impact of development on their settings. Consequently, the evaluation of cultural effects remains incomplete and overlooks their importance to community life.

Moreover, the application neglects to address intangible cultural heritage elements, including the Gaelic language and traditions, which are central to the identity of the area. The long-standing relationship between the community and the coastal environment is completely disregarded in the assessment, representing a major omission. Without these considerations, the cultural implications of the development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity akin to that of an Indigenous People, yet no process of Free, Prior and Informed Consent has been pursued. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

Furthermore, there is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thus hindering a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition for living cultural practices, clearly deviates from policy requirements.

In summary, the failure to assess living heritage, intangible cultural values, community rights, and statutory obligations has resulted in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

There is evidence suggesting that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts

arise from direct engagement and are thus not conjectural. However, the non-disclosure of the full assessment inhibits proper scrutiny of the findings, limiting the capacity to evaluate their significance in the decision-making process.

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

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

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

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

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an assessment that is both incomplete and unreliable. This situation hinders a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts is fundamentally flawed, failing to accurately depict the extent of change and the sensitivity of the environment. The character of the West Lewis coastline is marked by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines situated near the shoreline would introduce a continuous industrial presence that would fundamentally alter this character and result in a permanent transformation of the landscape.

Furthermore, the application inadequately addresses the magnitude of the visual change. Given the scale and proximity of the turbines, they would dominate views from

residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately capture this level of impact or its significance within such a sensitive landscape.

Concerns arise regarding the selection and representation of visual viewpoints within the assessment. There is evidence that the viewpoints chosen may not sufficiently reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape setting, linked visually and spatially to the Atlantic horizon. The assessment considers these sites in isolation, neglecting 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 issue transcends mere visual impact, representing a broader cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 concerning the protection of natural environments and historic assets. The scale of transformation proposed is incompatible with the mandate to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the assessment of construction and pollution risks, which is incomplete and lacks the necessary detail to evaluate potential environmental effects. It involves considerable seabed preparation and

installation work within a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent, hindering any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures raises particular concerns in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges risks associated with sediment mobilisation and the potential for accidental chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

There exists uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous 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 potential effects on marine species and habitats identified as sensitive in the broader assessment.

Further compounding these issues is the absence of detailed emergency response procedures. The decision to defer contingency planning until after consent prevents the evaluation of whether adequate safeguards will be in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be assessed prior to granting consent. In cases where this information is absent, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. The application fails to provide a robust evaluation of the ecological or socio-economic impacts, raising significant concerns about the protection and maintenance of these habitats and uses without substantial disruption. A critical issue lies in the assumption that fishing activities can be displaced without

consequences. There is no evidence presented that alternative fishing grounds are available or capable of sustaining additional pressure. This lack of information is important, as the risk of overfishing in different areas poses potential wider economic implications for the local fleet.

Moreover, the proposal introduces considerable risks to marine species, particularly due to underwater noise from construction activities. The high-energy hammer piling anticipated over a prolonged period is expected to disturb marine life over extensive areas, notably affecting species such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses the severity of these impacts without adequate supporting evidence.

Additionally, there exists an inconsistency within the application regarding the need for licences to permit harm to European Protected Species, while simultaneously minimising the anticipated impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding adherence to the Habitats Regulations, especially where harm is anticipated to a level necessitating legal authorisation.

The assessment also overlooks the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies highlighted—particularly the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies—render the assessment incomplete and unreliable. These gaps obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly inadequate and does not take into account the full range of impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are inherently linked; however, they are evaluated separately. This results in a disjointed approach that conceals the actual magnitude of the environmental and socio-economic consequences.

Included in the onshore components are cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure

traversing sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered collectively; nevertheless, the division of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities remain poorly understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not indicate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or demonstrate that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which brings into question the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment. The Environmental Impact Assessment does not address the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors, which is a significant oversight given the

importance of dark skies to the region and to emerging tourism sectors like astro-tourism.

Furthermore, there is a complete lack of evaluation concerning the effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The application fails to include any assessment of lighting impacts or a phototaxis study, neglecting to evaluate how aviation lighting might affect these species or contribute to increased mortality rates.

This critical omission is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been considered. The absence of site-specific night-time data creates a significant gap in understanding ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse impacts beyond reasonable scientific doubt has not been met, engaging the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the broader evaluation of landscape and seascape impacts, as the character of night-time is a vital aspect of the environment.

In summary, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an incomplete application that 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 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

I am absolutely disheartened with the prospect of this massive industrialisation Of our Island. Nobody has mentioned the release of radioactive isotopes from the peat and huge areas of Peatland will be dredged up, if this goes ahead. Our peat has radioactive elements retained from the Chernobyl disaster. The wind mills are massive

and will be detrimental to bird life , sea life will be affected also when the drilling begins, if it does. Please please listen to us Islanders that we do not wish this to be in our waters or our land. Our dark skies will no longer be dark, the sound from this sea farm will also have effects on the people that live here. There are many research papers on this topic to back up what I am saying. The effects of infrasound were NOT considered in the environmental assessment for N4.

I also worry about the affect on our NHS, having so many thousands of men come to the Island. It is hard enough to get a GP or Dentist appointment as it is, what will it be like when they all come? The proportion of men to women will be changed to an unnatural situation and I expect this will change the town forever adding pressure to already stretched amenities.

N4 does not have planning permission yet all the work is going ahead as if it has all been approved! What is going on??

Are you aware that 88% of residents living in West Lewis are against this proposal? I live in Stornoway and I know of not ONE person that is for this to go ahead!

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: 9D951C6D

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

Dear Sir/Madam

This letter presents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and strong cultural significance. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory obligations, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful assessment. Important environmental data is absent, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The reliance on a flexible design framework hinders a clear understanding of potential significant effects, and the unspecified mitigation measures prevent an evaluation of their effectiveness. Consequently, the documentation does not facilitate a complete or informed understanding of the potential environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidential support.

The proposal exhibits clear and substantial conflicts with policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and public health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests required for consent and weaken the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines located close to the shoreline, raises considerable concerns about landscape capacity, visual impact, and overall environmental consequences. When considering the insufficient information provided, the reliance on undefined mitigation, the weaknesses in evidence, and the clear conflicts with policy, it is evident that the application is incomplete and unable to support a lawful determination. Therefore, the precautionary principle must be applied in this context.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately consider the West Lewis coastline as a living cultural landscape, where environment, language, tradition, and community are interconnected. The application adopts a simplistic view of heritage, treating it merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts of the proposed development is inadequate and does not reflect the significant changes or the sensitivity of the West Lewis coastline. This area is known for its open Atlantic horizon and undeveloped character, which provide a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a dominant industrial presence, fundamentally altering the area's character and resulting in a permanent transformation of the landscape.

The application does not effectively depict the extent of visual change. The size and closeness of the turbines would dominate views from residential locations, historic sites, and popular coastal areas. This would adversely affect visual amenity and diminish the naturalness and remoteness that define the region. The assessment fails to adequately communicate the level of impact or its importance within this sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been underestimated, which undermines the assessment's reliability.

Moreover, there is a failure to consider the interconnected relationships between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, resulting in an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and affecting their relationship with the natural horizon. This represents not only a visual impact but also a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The magnitude of change is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further calls into question the proposal's compliance with policy requirements.

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

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage.

These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not provide a comprehensive or dependable evidential foundation for determination.

There are critical deficiencies in baseline data, a reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment represents a significant omission. These failures obstruct the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Uncertainties regarding environmental risks persist and may be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent internally. The evidential requirement to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with policy contradictions and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to request the submission of the missing information.

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

Additional Comments

I have family who live in Barvas and have visited consistently throughout my life. I enjoy visiting the shore and the proposed wind farm will leave a permanent scar on the seascape. I strongly object to the matter as it will impact the visual landscape and community identity as the locals do not wish for a large windfarm to exist on their doorstep. It is important to protect the natural landscape of the world.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3DF20E00

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The concerns expressed are rooted in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The development site is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The proposal's scale, design, and proximity to the shoreline raise essential questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Crucially, the application lacks a sufficient evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Several key aspects of the proposal are still undefined, and the use of a flexible design framework obscures the likely significant effects. The reliance on unspecified mitigation measures further complicates the assessment, making it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust support.

Furthermore, there are clear and significant policy conflicts within the application. It 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. The application does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and diminish the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises considerable concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency to properly evaluate the likely environmental effects of the proposal. The flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates considerable uncertainty. This ambiguity hampers the ability to apply a worst-case scenario consistently, undermining the reliability of the assessment and failing to convey the true scale of potential environmental impacts to both the public and the relevant authorities.

Furthermore, the application places heavy reliance on mitigation measures, monitoring strategies, and management plans that are not yet defined. This approach seeks consent on the premise that any environmental harm will be managed at a later date, thus inhibiting meaningful evaluation of their effectiveness and the assessment of residual impacts. Such deferral of vital information to post-consent phases is procedurally unacceptable and contradicts the core aim of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation measures must be clearly defined before any determination.

The report also exhibits significant evidential deficiencies, marked by gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This lack of sufficient information leads to uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are asserted without adequate supporting data. The shortcomings in information hinder an understanding of cumulative and worst-case impacts and introduce scientific uncertainty that conflicts with statutory requirements.

Consequently, the application does not satisfy the evidential standards necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity. It cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks the necessary comprehensiveness and reliability to accurately reflect the ecological receptors within the West Lewis coastal environment. This area is known for its biological activity and

sensitivity, yet the available baseline data is insufficient, and the methodologies employed do not effectively document species presence, behaviour, and habitat use. Consequently, the assessment fails to deliver a credible evidential basis for evaluating potential impacts.

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

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

These methodological shortcomings indicate that conclusions claiming negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data hampers the ability to meaningfully assess cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the elimination of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented is fundamentally unreliable, riddled with internal inconsistencies and gaps in evidence that significantly undermine its conclusions. It fails to meet the required evidential threshold necessary to demonstrate that the development will not adversely affect internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. The

turbines are sited within critical foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

Moreover, there is a glaring contradiction within the application itself. The developer asserts that there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency raises serious doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not backed by sufficient evidence. The assessment lacks adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully consider the significance of these feeding grounds, and the reliance on modelling introduces uncertainty, particularly for species such as Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially in the face of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor compounds the risks involved, as it effectively creates a barrier in a primary flight path used by birds travelling between the United Kingdom and Iceland. The long-term implications of ongoing mortality within this corridor, along with the potential impacts on species with relatively small global populations, have not been thoroughly assessed in the application.

From a regulatory standpoint, the application does not achieve the necessary standard to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and methodological limitations means that the requisite standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle and renders any conclusion in support of consent unlawful. Additionally, the identified deficiencies indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places this proposal in direct conflict with national policy.

In summary, the assessment's internal inconsistencies, methodological flaws, and lack of sufficient evidence prevent a thorough evaluation of the potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally insufficient and fails to recognise the West Lewis coastline as a dynamic cultural landscape where language, tradition, environment, and community are intrinsically linked. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static assets instead of acknowledging their ongoing social,

cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and spaces for spiritual practice, yet the assessment mischaracterises them as static features. This oversight disregards their continued use and significance, as well as the impact of development on their settings. Consequently, the evaluation of cultural effects is incomplete and overlooks their importance in community life.

Furthermore, the application neglects intangible cultural heritage, including the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely missing from the assessment, representing a considerable omission. The cultural impact of the development cannot be adequately grasped without considering these elements.

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

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the recognition of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory duties results in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to present a robust foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development presents significant concerns regarding social impacts, health, and wellbeing, primarily due to a lack of transparency in the evaluation process. A Social Impact Assessment was commissioned by the developer, which included focus groups involving local residents, yet the complete report remains unpublished. This absence of full disclosure constitutes a crucial evidential gap, hindering both the

public and the competent authority from fully grasping the social risks highlighted by the developer's own research.

Available summaries reveal that residents are currently facing measurable levels of stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts arise from direct community engagement and are thus based on concrete evidence rather than speculation. Nevertheless, the failure to provide the full assessment limits the ability of stakeholders to scrutinise the findings effectively and assess their importance in the decision-making process.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with a notion of "cultural loss" emerging from the developer's findings. Despite this acknowledgment, the associated impacts have not been adequately integrated into the main application nor afforded the necessary attention. The retention of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency has detrimental effects on the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health implications is vital for developments of this magnitude, especially where community dynamics may be at stake. The absence of the complete data set leads to a failure in presenting a thorough evidential foundation necessary for evaluating the balance between the proposed benefits and potential harm.

From a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the evidence at hand indicates existing adverse effects that have not been fully revealed. Without access to the full assessment, it remains impossible to ascertain compliance with this policy.

The procedural ramifications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a material flaw within the application and signifies a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the overall assessment incomplete and unreliable. This inadequacy prevents a lawful determination and reinforces the argument that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is insufficient and does not capture the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a

strong sense of remoteness. The proposed large-scale turbines situated near the shoreline would result in a continuous and dominant industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application does not adequately convey the extent of this visual change. Given the scale and closeness of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This would diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the level of impact or its importance in relation to such a sensitive landscape.

Concerns arise regarding the choice and presentation of visual viewpoints. There is evidence that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, which affects the assessment's reliability.

Additionally, there is a failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape interlinked visually and spatially with the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are understood and their connection to the natural horizon. This constitutes not just a visual impact but also a broader cultural and spatial damage that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which emphasises the need to protect natural areas and historic assets. The degree of change proposed does not align with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy conformity.

It is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and inescapable. Consequently, the resultant change is not something that can be reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and reinforce the view that the proposal conflicts with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application proposes substantial seabed preparation and installation works in a high-energy Atlantic environment, but it lacks the necessary detail to assess potential environmental effects adequately. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, and it relies heavily on mitigation and contingency measures that would only be prepared after consent. This approach is particularly concerning given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination.

The application acknowledges various risks, including sediment mobilisation and potential chemical or oil spills, yet it provides insufficient information on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to gauge the extent, duration, or ecological effects of such impacts, raising concerns about their implications for marine species and habitats that have already been identified as sensitive.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders an assessment of whether adequate safeguards are in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards conflicts with the stipulations of the Environmental Impact Assessment regime, which requires an assessment of likely significant effects and mitigation measures prior to granting consent. The absence of crucial information means that a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the shortcomings of not having defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts contribute to a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding the assessment of fisheries and marine life, which is inadequate and does not deliver a thorough evaluation of ecological or socio-economic impacts. The area off the West Lewis coast is home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not sufficiently demonstrate that these critical habitats and uses can be preserved or maintained without considerable disruption.

A notable issue is the presumption that fishing activities can be displaced without adverse effects. The application lacks any evidence indicating the availability, accessibility, or capacity of alternative fishing grounds to accommodate additional pressure. This gap is critical, as such displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-backed assessment, understanding the implications for fisheries and local livelihoods remains elusive.

Moreover, the proposed development poses considerable risks to marine species, especially due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged duration is expected to create disturbances over extensive distances, impacting species such as dolphins. The predicted effects on a notable portion of the local bottlenose dolphin population raise significant issues, yet the application tends to underestimate these impacts without adequate supporting evidence.

Inconsistencies are evident within the application itself, where it acknowledges the necessity of licences to allow harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially when harm is anticipated to a degree that mandates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

When viewed collectively, the deficiencies in the assessment regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the evaluation incomplete and unreliable. These shortcomings hinder a thorough assessment of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the development of onshore infrastructure linked to offshore turbines, yet the assessment provided is materially incomplete. This fragmented approach, which treats the offshore and onshore components separately, fails to capture the full extent of environmental and socio-economic impacts associated with this single integrated project. The onshore works include cabling across protected moorland, construction of a substation near Stornoway, and the creation of associated

access infrastructure, all of which traverse sensitive landscapes. Notably, these activities entail excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

Furthermore, the failure to assess onshore impacts either fully or in a timely manner prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the current separation of the offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities. This oversight poses significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not sufficiently demonstrate that the effects on these habitats have been thoroughly evaluated or that suitable avoidance measures are in place, creating a notable evidential gap regarding biodiversity protection.

The proposal additionally raises serious concerns about carbon balance. The disturbance of peatland could release stored carbon, potentially resulting in a carbon debt that contradicts the principles of renewable energy development. The application fails to adequately address this crucial issue or show that the overall carbon balance remains favourable. Moreover, the routing of the infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or processes have been initiated, raising significant questions about the project's deliverability and lawful implementation.

From a policy standpoint, the project's failure to assess it comprehensively and to ensure the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that adverse impacts can be avoided or mitigated further undermines the reliability of the application. In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, which ultimately prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play an essential role in shaping the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This development does not assess the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. The omission is particularly concerning given the significance of dark skies to the local identity and the growing astro-tourism sector.

Furthermore, the application fails to evaluate the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting, which can disorient them and increase their collision risk. No lighting impact assessment or phototaxis study has been included, resulting in a lack of understanding of how aviation lighting may affect these species or contribute to increased mortality rates.

The situation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this vulnerability has not been addressed. The lack of site-specific night-time data creates a significant gap in comprehending the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites might face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and hindering a lawful determination.

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

In summary, the lack of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit for supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. It mirrors the central issues that led to the 2008 rejection of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This new application is presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant gaps in the evidential basis necessary for proper determination of the application. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism, have resulted in an incomplete Environmental Impact Assessment. This inadequacy hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to provide a complete Social Impact Assessment represents a serious omission that prevents the competent authority from evaluating the effects on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, failing to prove the protection of biodiversity, natural spaces, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent in places. The evidence presented does not meet the threshold required to eliminate adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to request the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2FCC5DE8

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 is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the probable environmental repercussions of the proposal. By employing a flexible Project Design Envelope without any firm commitment to particular turbine dimensions, layouts, or configurations, significant uncertainty is introduced. This ambiguity undermines the

integrity of the assessment and means that the impacts outlined may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is being sought on the premise that environmental harm will be addressed after approval, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be thoroughly established before determination.

Moreover, there exist significant evidential deficiencies, such as gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including stipulations concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough assessment of environmental effects and mean that the competent authority lacks the necessary information to make a determination regarding the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is fundamentally flawed and fails to provide a thorough and trustworthy understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is not only biologically active but also highly sensitive, yet the baseline data remains incomplete, and the methodologies utilised do not adequately capture the presence, behaviour, and habitat use of the species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight in this application pertains to otters, which are designated as a European Protected Species. There has been inadequate recognition and assessment of their active foraging and movement within the coastal areas. 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 sufficiently examined. This shortcoming undermines any conclusions drawn regarding the absence of significant effects on this species.

Furthermore, the evaluation of basking sharks is deficient, as it relies heavily on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations which demonstrate their frequent use of these waters. The omission of relevant data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions drawn regarding negligible or non-significant effects rest on assumptions rather than on strong evidence. The lack of adequate baseline data also obstructs a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The degree of uncertainty created precludes the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of 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 and contribute to the overall determination that the application lacks an adequate evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development on the west coast of the Isle of Lewis is fundamentally flawed, with substantial gaps in evidence that severely undermine its conclusions. This region supports internationally important seabird populations, many of which are already in decline. However, the application has not demonstrated to the required evidential standard that these species will not face adverse effects. Key foraging areas and migratory pathways, where the turbines are to be sited, have not been adequately assessed for implications regarding displacement, collision risk, or habitat loss.

There is a significant contradiction within the application. The developer claims that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, a requirement that arises only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not supported by solid evidence.

The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised may underestimate mortality rates, especially given that baseline data is incomplete and there is insufficient understanding of behavioural responses.

Placing turbines within a recognised migratory corridor presents an additional and significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. There is inadequate assessment of the long-term consequences of continued mortality in this corridor, as well as potential impacts on species with comparatively small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been met. This triggers the precautionary principle, preventing a lawful conclusion in support of consent.

Moreover, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to 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 rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of adequate evidence. These failures hinder a thorough evaluation of the impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline should be recognised as a living cultural landscape, where environment, language, tradition, and community are intricately linked. However, the assessment of cultural heritage and community identity in the application is inadequate, adopting a simplistic view that treats heritage as isolated and static, rather than acknowledging its ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These active burial sites, vital for spiritual practices, are inaccurately categorised as static features, neglecting their continued use and the potential impacts of development on their settings. This oversight leads to an incomplete evaluation of cultural effects, disregarding their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language and local traditions, alongside the community's long-standing connection to the coastal environment. These elements are central to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population represents a distinct cultural identity, akin to that of an Indigenous People; yet, the absence of a process for Free, Prior and Informed Consent undermines the credibility of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions affecting cultural and environmental interests.

A critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone is sufficient to prevent a lawful determination.

From a policy standpoint, these deficiencies conflict directly with National Planning Framework 4, especially regarding the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, along with the neglect of living cultural practices, represents a clear departure from policy standards.

Overall, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations result in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sound basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the complete Social Impact Assessment is a significant oversight that undermines the entire evaluation process. While they conducted focus groups with local residents, the absence of the full report creates a critical evidential gap, which hampers both public understanding and the competent authority's ability to assess the social risks identified through the developer's research. This lack of transparency severely impairs the Environmental Impact Assessment, making it impossible to fully grasp the social, economic, and health implications of

such a large-scale development.

Residents have already reported measurable levels of stress, anxiety, and concern linked to the proposal's size and proximity, illustrating the immediate impact on the community. These findings are grounded in direct engagement, not speculation, yet the incomplete disclosure of the assessment prevents thorough scrutiny and diminishes the importance of these impacts in the decision-making process.

Additionally, the proposal poses a perceived threat to community identity and cohesion, with indications of "cultural loss" present in the developer's findings. Regrettably, these impacts have not been adequately reflected in the application or given the necessary consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development, leaving the application deficient in presenting a complete evidential basis to balance benefits against potential harm.

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

The procedural implications of this deficiency are considerable. The competent authority is unable to perform a comprehensive socio-economic and health evaluation in the absence of the full Social Impact Assessment, representing a material omission within the application. Overall, the combination of the non-disclosure of this critical assessment and the evidence of existing adverse impacts results in an incomplete and unreliable evaluation. This not only prevents a lawful determination but also reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in the assessment of seascape, landscape, and visual impacts, failing to adequately convey the extent of change or the sensitivity of the environment affected. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would introduce a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Concerns arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not accurately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This issue raises the possibility that the magnitude of the visual impact has been understated, casting doubt on the reliability of the assessment.

The application also inadequately addresses the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. Rather than acknowledging this interdependence, the assessment treats these assets as isolated, resulting in a limited evaluation of the impacts on their setting and cultural importance.

Moreover, the proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not only a visual impact but a broader cultural and spatial detriment that remains insufficiently addressed in the application.

From a policy standpoint, the proposal conflicts with the National Planning Framework 4, particularly concerning the safeguarding of natural areas and historic assets. The magnitude of change proposed is inconsistent with the obligations to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any assertions of compliance with relevant policies.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resulting changes are fundamental and permanent, rendering mitigation efforts unlikely to achieve an acceptable outcome.

Overall, the assessment does not accurately reflect the scale of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the assertion that the proposal is inconsistent with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application under consideration is fundamentally flawed in its assessment of fisheries and marine life, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital habitats and activities can be preserved without facing significant disruption.

A critical concern lies in the assumption made by the applicant that fishing activities can be displaced without any repercussions. There is a notable absence of evidence regarding the availability, accessibility, or suitability of alternative fishing grounds to accommodate the resultant pressure. This gap in information is crucial, as the potential for displacement poses risks of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and the livelihoods associated with them remain poorly understood.

The proposal further introduces considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The extensive use of high-energy hammer piling is expected to disturb marine life over large distances, particularly impacting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises profound concerns; yet, the application minimizes the importance of these effects without adequate evidence to support such claims.

Additionally, there exists a contradiction within the application regarding the need for licences to permit harm to European Protected Species, even as the impacts are described as negligible. This inconsistency undermines the reliability of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when harm is anticipated to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions present in the application render the assessment inadequate and unreliable. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it entirely lacks an evaluation of dark skies and nocturnal wildlife, which constitutes a material omission. The West Lewis coastline is noted for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly consequential given the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The lack of such assessments

creates a distinct gap in the overall landscape and environmental evaluation.

Moreover, there is no consideration of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting, which can result in disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means there is no understanding of how aviation lighting may affect these species or contribute to higher mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data leaves a critical void in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not fulfilled, thereby invoking the precautionary principle and inhibiting a lawful determination.

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

In conclusion, the absence of assessments related to dark skies and nocturnal wildlife represents a significant evidential gap. The deficiency 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 reflects a significant failure to meet the requirements for sustainable development as dictated by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in several key areas.

There are serious deficiencies in the evidence provided for assessment. The proposal lacks a comprehensive and reliable evidential basis, with critical gaps in baseline data and the use of an undefined design envelope. It relies on unspecified mitigation measures and neglects to address important impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism

consequences. As a result, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings. The omission of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment represents a significant oversight. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

Additionally, the proposal contradicts National Planning Framework 4 by failing to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable nor provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either denies consent based on these grounds or exercises the appropriate regulatory measures to require the submission of the necessary missing information. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AAFE418B

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence, raising significant concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential basis necessary for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework inhibits a clear understanding of potential significant effects. This, coupled with the reliance on unspecified mitigation measures, renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with established policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine that the development meets policy acceptability.

The scale of this proposal is unprecedented in the area, with large turbines situated in close proximity to the shoreline, which introduces serious concerns regarding landscape capacity, visual impact, and environmental consequences. In light of the insufficient information, reliance on undefined mitigation, evidential weaknesses, and apparent policy non-compliance, it is clear that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application relies on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and undermines the integrity of the Environmental Impact Assessment Report, preventing a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that could ultimately be constructed. This obscures the true extent of environmental effects, preventing both the public and the competent authority from having a clear understanding.

There are considerable evidential deficiencies, including insufficient baseline data, limitations in the methodology, and an overreliance on assumptions rather than site-specific evidence. This lack of robust supporting data results in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory requirements.

The application seeks consent based on the promise of addressing environmental harm through unspecified mitigation measures, monitoring strategies, and management plans at a later stage. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's requirement that significant effects and mitigation measures are established before determination.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, it fails to demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

In summary, the combination of relying on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These significant deficiencies hinder a lawful and robust assessment of environmental effects, meaning the competent authority cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One notable oversight is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. By neglecting to assess their core foraging range and behavioural patterns, the potential effects of construction-related disturbance, noise, and increased activity on otters are not properly evaluated. This lack of consideration undermines any assertions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant gaps and inconsistencies that undermine its findings. It is crucial to note that the development is situated within key foraging areas and migratory pathways for seabirds. However, the application does not provide adequate evidence to show that these internationally important seabird populations, many of which are in decline, will not be adversely affected. There is a lack of robust evaluation regarding the potential risks of displacement, collision, and habitat loss.

Moreover, a fundamental contradiction arises within the application, which states there will be no significant adverse effects while simultaneously putting forward a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated. Such inconsistency raises doubts about the reliability of the assessment, suggesting that its conclusions are not well-supported by the available evidence.

The assessment fails to adequately demonstrate that seabird species linked to protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of these feeding areas is not fully acknowledged, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, particularly given the incomplete baseline data and the lack of understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses a significant risk. This situation creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not thoroughly consider the long-term effects of sustained mortality in this corridor or the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential standard to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, means that the requisite standard of beyond reasonable scientific doubt has not been reached. This situation engages the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, the identified deficiencies indicate a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided fails to adequately evaluate community identity and cultural heritage, notably overlooking the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are fundamentally interwoven. By adopting a reductive perspective that treats heritage as a collection of isolated and static assets, the application neglects to recognise their ongoing social, cultural, and spiritual relevance within the community.

There exists a significant deficiency in how culturally significant sites, such as the

cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites are not merely static features; they are active places of burial and spiritual practice. The current assessment mischaracterises these locations, failing to account for their continued use and meaning, as well as the potential impacts of development on their surroundings. Such misrepresentation results in an incomplete evaluation of the cultural effects and disregards their importance in community life.

Additionally, there is a troubling absence of consideration for intangible cultural heritage, which includes vital elements such as the Gaelic language, local traditions, and the deep-rooted relationship between the community and the coastal environment. These aspects are central to the area's identity but have been entirely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns regarding community rights and engagement further exacerbate the situation. The Gaelic-speaking population, which embodies characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to established principles for participation in decisions affecting cultural and environmental matters.

Moreover, there is a critical procedural failure in the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment inhibits the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

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

Collectively, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been thoroughly assessed, and the application does not present a robust foundation for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is fundamentally flawed due to a lack of transparency surrounding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report remains unpublished. This creates a significant evidential gap, obstructing both the public and the competent authority from grasping the full extent of social risks as identified by the developer's own research.

Summaries indicate that local residents are already facing measurable stress, anxiety, and concern as a result of the scale and proximity of the proposal. These impacts arise from direct engagement, making them factual rather than speculative. However, without the complete assessment, there is insufficient scrutiny of these findings, which limits the capacity to ascertain their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly where community character and functioning could be at stake. The application, by omitting the full dataset, does not provide a comprehensive evidential basis to assess the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is crucial that development supports positive health outcomes and mitigates harm; however, existing evidence indicates adverse effects that remain undisclosed. Without the full assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of this situation are significant, as the competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material failure in the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This scenario obstructs a lawful determination and confirms that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their relationship to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application under consideration lacks a thorough assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. It does not sufficiently demonstrate how these important habitats and activities will be protected or maintained without significant disruption.

A critical concern is the assumption made within the application that fishing activity can be displaced without any adverse consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can handle the additional pressure that would result from such displacement. This significant omission raises concerns about the potential for overfishing in other areas, which could lead to broader economic repercussions for the local fishing fleet. Without a clear and evidence-backed assessment, understanding the impacts on fisheries and local livelihoods remains impossible.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated to occur over an extended period is expected to cause disturbances across considerable distances, affecting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application tends to minimize the importance of these effects without providing adequate evidence.

There are also inconsistencies within the application itself. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously describes the expected impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when potential harm is significant enough to necessitate legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal supports sustainable development.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria of sustainable development as evaluated against statutory obligations, national policies, and evidential standards. This application echoes the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Presenting it now under a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate these concerns.

Moreover, the application lacks a complete and reliable evidential basis for decision-making. There are significant deficiencies in baseline data, the utilisation of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

Additionally, clear procedural shortcomings exist. The failure to submit a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a substantial omission. These gaps inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate effective protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit as it lacks tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, thereby obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, alongside policy conflicts and unresolved

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

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

Additional Comments

This is one of the most beautiful and unspoiled areas of Scotland and the UK. Our wildlife is precious. The wider and longterm impact of such a huge development is unknown. This is quite apart from the construction period which will have severe impact on our community. There is not the infrastructure to support this development. We do not have provision in our public services to support many incoming workers either. What benefit is this going to be to the people who actually live here? Who is going to benefit financially? Not this community for sure! What will happen when these huge structures wear out and need to be removed? How is this waste going to be managed? There are many unanswered questions.

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: AF521745

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

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

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

Consequently, the application fails to meet the evidential standards required under the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly in relation to the safeguarding of biodiversity and environmental integrity, as it cannot confirm that all impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the existence of gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, ultimately leaving the competent authority without the necessary information to make an informed decision on the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a concerning deficiency in the assessment of marine ecology and protected species, failing to provide a complete understanding of the ecological receptors within the sensitive West Lewis coastal environment. This biologically active

marine system has been inadequately studied, with incomplete baseline data and methodologies that do not effectively capture species presence, behaviour, or habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, which are recognised as a European Protected Species. The application does not adequately assess their active use of coastal areas for foraging and movement. The omission of critical information regarding their core foraging range and behavioural patterns means that the possible effects of construction disturbances, noise, and increased activity remain unexamined. This shortfall undermines any conclusions about the absence of significant effects on otters.

The assessment of basking sharks also reveals critical flaws, particularly due to the reliance on aerial surveys which introduce considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that show frequent use of these waters. By failing to incorporate or properly consider relevant data, the assessment presents an incomplete baseline, thereby weakening the reliability of the conclusions.

The methodological shortcomings lead to conclusions of negligible or non-significant effects being drawn from assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data hinders the ability to meaningfully assess cumulative and indirect impacts, as well as seasonal variations and wider ecosystem interactions. This lack of clarity raises uncertainty regarding the actual scale of risk to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it inadequately identifies and assesses protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, which activates the precautionary principle. In light of these factors, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that seriously undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines. However, the application fails to convincingly demonstrate that these species will not be adversely affected.

Located within key foraging areas and migratory pathways, the development does not adequately evaluate the implications of potential displacement, collision risks, or habitat loss.

A crucial contradiction arises within the application, wherein the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn lack adequate support from the underlying evidence. Furthermore, the assessment does not sufficiently prove that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is underrepresented, and the reliance on modelling methods introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to assess the long-term implications of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential standards required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary to support its determination.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is known for its clean coastal waters and significant habitats, both of which are susceptible to disturbance and contamination. The proposal for substantial seabed preparation and installation works within this high-energy Atlantic environment raises serious concerns, particularly as the assessment of construction and pollution risks is incomplete. The application lacks fully developed Construction

Environmental Management Plans and Pollution Prevention Plans, relying instead on undefined mitigation and contingency measures that would be formulated after consent has been granted. This approach hinders any meaningful evaluation of their adequacy or effectiveness.

There is a troubling reliance on future measures that are not yet defined, especially given the sensitivity of the receiving environment. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, leaving potential effects on marine species and habitats inadequately addressed.

The absence of detailed emergency response procedures exacerbates these issues. Deferring contingency planning to a post-consent stage obstructs the assessment of whether sufficient safeguards are in place to handle pollution events. This not only introduces procedural risk but also compromises the ability of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the lack of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. The assessment of likely significant effects and necessary mitigation must occur prior to granting consent, and the absence of such information renders a lawful determination unachievable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, detailed management plans, and clarity regarding potential impacts contribute to a materially deficient assessment. These shortcomings further underscore the conclusion that the application is incomplete and cannot be appropriately evaluated for construction and pollution risks.

FISHERIES AND MARINE LIFE

The application poses serious concerns regarding the assessment of marine life and fisheries, which appears fundamentally inadequate. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate how these critical uses and habitats can be protected against significant disruption.

A troubling aspect of the proposal is the assumption that fishing activities can be relocated without any repercussions. There is no evidence provided to confirm that alternative fishing grounds exist or that they would be accessible and capable of handling increased pressure. This is a significant omission, as forcing fishing displacement could lead to overfishing in other areas, ultimately threatening the livelihoods of the local fishing fleet. Without a thorough and evidence-based

assessment, understanding the true impacts on fisheries and the communities dependent on them is impossible.

Moreover, the proposal presents considerable risks to marine species, particularly due to underwater noise from construction activities. The prolonged use of high-energy hammer piling is expected to create disturbances that could affect marine life over extensive areas, including the local population of bottlenose dolphins. The application seems to downplay the predicted effects on these dolphins, despite the serious nature of the threat, lacking adequate evidence to support such minimisation.

There is a troubling inconsistency within the application regarding the need for licences for any harm to European Protected Species. While it acknowledges the requirement for such permits, it simultaneously describes these impacts as negligible. This contradiction seriously undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not provide assurance that the development can coexist with existing marine users or that it will avoid unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal represents sustainable development.

In conclusion, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These shortcomings significantly hinder a comprehensive evaluation of the impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the essential criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal does not adequately address these critical concerns.

Significant gaps in baseline data and the continued use of an undefined design

envelope undermine the reliability of the application. Additionally, it relies on unspecified mitigation measures and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, obstructing a comprehensive understanding of potential significant effects or residual impacts.

There are notable procedural shortcomings as well. The lack of a compliant Islands Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment is a material omission. These deficiencies hinder the competent authority from accurately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to illustrate the protection of biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been adequately evaluated, obscuring implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unsuitable for determination. The multitude of information deficiencies, combined with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I object to the proposed Spiorad na Mara wind farm on the grounds of destruction to the environment, marine life, bird life, fisheries and the associated construction & pollution risks. More & more information is being discovered about the negative impact of these huge turbines on human & animal life yet this is not taken into consideration in the impact assessment.

Thank you for taking my views into consideration,

[Redacted]

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 083C8D35

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and accompanying materials, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised regarding the compatibility of the proposal's scale, proximity, and design with statutory obligations, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful assessment. There are critical gaps in environmental data, with baseline information that is both limited and inconsistent, while several key components of the proposal remain undefined. The application employs a flexible design framework, which complicates the understanding of potential significant effects, and the unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident, with the proposal appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4. This inconsistency is particularly relevant concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the ability of the competent authority to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal raises serious concerns, particularly regarding the placement of large turbines in close proximity to the shoreline, which could significantly impact landscape capacity and create visual dominance. The combined effect of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and notable policy non-compliance underscores that the application is incomplete and unfit to support a lawful determination. In this context, the application of the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent and reliable account of the environmental effects associated with the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development that is ultimately constructed, leading to a failure to inform the public and the competent authority about the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is being requested on the basis that potential environmental harm will be addressed later, which impedes a meaningful evaluation of effectiveness and the assessment of residual impacts. This deferment of essential information to post-consent stages is procedurally unacceptable, contradicting the purpose of the Environmental Impact Assessment regime that mandates the clear establishment of likely significant effects and mitigation prior to determination.

Moreover, the assessment presents significant evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes essential requirements for biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are implemented.

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

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their

environmental effects, it merely outlines the project's development history. This lack of analysis does not show that less harmful options have been properly identified and assessed in preference to more damaging solutions.

There is no clear or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has given serious consideration to placing turbines further offshore, where visual, ecological, and coastal impacts would probably be lessened. The sensitivity of the West Lewis coastline makes proximity to shore crucial in assessing impact. The lack of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

This inadequacy also applies to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, along with the lack of comparative analysis, suggests that design-based mitigation has not been implemented, leading instead to reliance on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of the marine ecology and protected species is inadequate and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the baseline data is lacking, and the methodologies used do not capture the presence, behaviour, and habitat use of species effectively. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One significant oversight is the assessment of otters, a European Protected Species. The application does not adequately recognise and assess their active use of the coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been fully evaluated. This shortcoming undermines conclusions regarding the absence of significant effects on this species.

Furthermore, there are deficiencies in the assessment of basking sharks due to reliance on aerial surveys, which introduce considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show these waters are frequently used by the species. The failure to include or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements or the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of this, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the ornithological assessment associated with the application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment fails to demonstrate, to the necessary evidential standard, that these species will not face adverse effects. Critical foraging areas and migratory pathways have not been robustly evaluated in terms of displacement, collision risk, or habitat loss, leaving key impacts unaddressed.

A fundamental contradiction is evident in the application, where the developer concludes that no significant adverse effects will occur while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that its conclusions are unsupported by the available evidence. The assessment does not sufficiently prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species already in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate

mortality, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of sustained mortality within this corridor and the potential repercussions for species with relatively small global populations.

Regulatory compliance is also called into question, as the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

Overall, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these issues render the assessment unreliable, highlighting internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings thwart a thorough evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the assessment approaches cultural heritage in a reductive manner, viewing it as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

Notably, the evaluation does not adequately consider culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are active sites of burial and spiritual practice, yet the assessment regards them as mere static features, disregarding their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural ramifications and overlooks their importance in community life.

Additionally, the intangible aspects of cultural heritage, including the Gaelic language, traditions, and the enduring bond between the community and the coastal environment, are not taken into account. These elements are vital to the area's identity, yet they are conspicuously missing from the assessment, resulting in a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains unexamined.

There are pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity and the characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of genuine engagement calls into question the validity of the assessment and neglects essential principles of participation in matters that affect cultural and environmental interests.

A significant procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings conflict directly with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In conclusion, the neglect to assess living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application without a solid foundation for understanding the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This absence of transparency further compromises the Environmental Impact

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application lacks a thorough assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its unspoiled Atlantic horizon and an overwhelming sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a persistent and dominating industrial presence, fundamentally transforming this unique character and resulting in permanent and irreversible changes to the landscape.

Furthermore, the visual impact is not represented adequately within the application. The size and proximity of the turbines would overshadow views from residential areas, historic locations, and popular coastal sites, thereby directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This introduces the risk that the visual impact has been understated, casting doubt on the assessment's reliability.

Another critical shortcoming is the lack of evaluation regarding the interconnected

relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected by visual and spatial relationships to the Atlantic horizon. The assessment isolates these heritage assets, ignoring their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their bond with the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that the application fails to adequately assess.

From a policy perspective, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately capture the extent of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies impede a reliable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal includes extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent, which hampers any meaningful assessment of their sufficiency or effectiveness. This approach raises significant concerns, particularly given the sensitivity of the surrounding environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be 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, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as

sensitive in the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information precludes a lawful determination. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in the assessment of fisheries and marine life, failing to provide a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate how these critical uses and habitats can be preserved without causing substantial disruption.

One of the most pressing concerns lies in the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to support the existence, accessibility, or capacity of alternative fishing grounds that could absorb the resultant pressure. This critical omission poses a risk of overfishing in different areas and threatens economic stability for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal introduces significant risks to marine species, particularly from the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life over large distances, adversely affecting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population raises urgent concerns, yet the application minimises the significance of these disturbances without presenting sufficient evidence.

There is a notable inconsistency within the application itself, where the requirement for licences to permit harm to European Protected Species is acknowledged, while simultaneously categorising impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to address the cumulative impacts stemming from multiple stressors, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic environment.

From a policy perspective, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby hindering any conclusion that the proposal aligns with sustainable development principles.

In summary, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the presence of internal contradictions render the assessment incomplete and untrustworthy. These shortcomings obstruct a proper evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is inadequate and fails to address the full range of impacts associated with what constitutes a single integrated project. There is a fundamental connection between the offshore turbines and the onshore works, yet these components are evaluated in isolation. This fragmented assessment obscures the comprehensive understanding of the environmental and socio-economic repercussions that arise.

The onshore infrastructure encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in regions of deep peat, specifically within Barvas Moor, which serves as a critical carbon store and is an ecologically fragile habitat. The application lacks a thorough assessment of these impacts, which hinders a complete understanding of the overall environmental footprint of the project.

By not adequately addressing the onshore impacts, the application inhibits a proper evaluation of cumulative effects. According to the Environmental Impact Assessment process, it is essential that all elements of a project are considered collectively. The current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

Moreover, there are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policies. The application fails to demonstrate that impacts on these critical habitats have been thoroughly assessed or that suitable avoidance measures are in place, resulting in a concerning evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance related to this proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or provide assurance that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises significant doubts about deliverability and the lawfulness of implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is distinguished by exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a material omission. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, risks creating a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the importance of dark skies to the area's identity and emerging tourism sectors, such as astro-tourism. The failure to consider these aspects leads to a noticeable gap in the overall landscape and environmental assessment.

More critically, the absence of any evaluation regarding the effects on nocturnal wildlife cannot be overlooked. Species like Manx Shearwater, European Storm Petrel, and

Leach's Storm Petrel are highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or a phototaxis study, preventing an understanding of how aviation lighting may affect these species or contribute to mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately reflect nocturnal activity or the associated risks. Species such as Kittiwakes, which might forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential impact has not been addressed. The absence of site-specific night-time data creates a significant deficiency in understanding the ecological impacts.

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

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

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient for supporting a lawful determination.

TOURISM

The Isle of Lewis relies heavily on tourism, which has grown from £65 million in 2017 to over £81.5 million, accounting for up to 16% of the island's economy and supporting more than 1,000 jobs. The application acknowledges that 86% of visitors are drawn by the area's scenery. However, it fails to provide a quantified assessment of how large-scale offshore infrastructure may affect visitor numbers, behaviour, or the overall economic contribution of tourism.

Additionally, the assessment does not consider the importance of environmental quality, including unspoiled landscapes and dark skies, to the visitor experience. This oversight extends to the lack of a Dark Skies Assessment, leaving a significant gap in understanding the impacts on nature-based tourism and astro-tourism, which are growing markets for the local economy.

Given the limited economic diversification on the island, the failure to assess tourism impacts carries wider implications for local businesses, employment, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities related to tourism have not been evaluated, as

required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to show a net benefit. It conflicts with strategic objectives identifying tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts and assess environmental influences on visitor behaviour leads to a significant evidential gap. This undermines a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. The application mirrors the main concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not sufficiently address these critical issues.

There are significant gaps in the baseline data provided, and the application relies on an undefined design envelope. Furthermore, it depends on unspecified mitigation measures and fails to include essential impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism consequences. Consequently, the Environmental Impact Assessment is lacking, which hinders a full understanding of potential significant effects or residual impacts.

Procedural shortcomings are also evident, particularly with the absence of a compliant Island Communities Impact Assessment, which breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment is a substantial omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

The environmental risks associated with the proposal remain uncertain and potentially severe. Assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidence required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either denies consent based on these grounds or invokes the relevant regulatory provisions to require the submission of the missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

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: 5DD061FD

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 the marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental protection, cultural considerations, and procedural integrity. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the proposal's scale, proximity, and design challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent, and key elements of the proposal remain undefined. The flexible design framework employed hampers a comprehensive understanding of potential significant effects. Moreover, the proposed mitigation measures have yet to be detailed, leaving their effectiveness unassessable. Consequently, the documentation does not facilitate a complete or informed understanding of environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsubstantiated by robust evidence.

Substantial conflicts with policy are evident. The proposal 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 the health and wellbeing of the community. It fails to prove that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to assess the development's acceptability in policy terms.

The scale of this proposal is unprecedented in this region, featuring large turbines in close proximity to the shoreline, which raises serious concerns about landscape capacity, visual dominance, and environmental impact. The lack of sufficient information, the reliance on unspecified mitigation measures, and evident policy non-compliance collectively indicate that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, adherence to the precautionary principle is essential.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal lacks a comprehensive and reliable Environmental Impact Assessment Report, which fails to adequately detail the potential environmental effects associated with the development. A flexible Project Design Envelope is utilised without clear commitments to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the ability to apply a consistent worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development, thereby obstructing both public and competent authority understanding of the true environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that are not yet defined. This means that consent is sought on the assumption that any environmental harm will be managed at a later stage, which hampers meaningful evaluation of the effectiveness of these measures or assessment of any residual impacts. Such deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before determination.

There are also serious evidential gaps, including deficiencies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty about the scale and significance of impacts, especially in cases where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. The proposal also fails to comply with National Planning Framework 4, particularly in aspects related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application has not provided a structured and reasoned comparison of realistic alternatives based on environmental effects, which is a significant shortcoming. Instead, it presents a narrative account of project evolution that fails to show that less harmful options have been properly identified, assessed, and chosen over more

damaging solutions. There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has seriously considered placing turbines further offshore, where the visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in determining impact, and the absence of such analysis raises questions about whether the proposed siting is the least damaging option.

The deficiencies also extend to cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the design has not been mitigated by proper planning, relying instead on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is lacking and does not give a complete or trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data presented is insufficient, and the methods used do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment fails to provide a solid evidential basis for assessing impacts.

A major gap involves otters, which are a European Protected Species. The application does not adequately recognise or evaluate their use of coastal regions for foraging and movement. Without considering their core foraging areas and behaviours, the potential effects from construction disturbances, noise, and increased activity have not been properly examined. This oversight undermines any conclusions drawn about the lack of significant effects on otters.

Additionally, there are further shortcomings in the assessment of basking sharks. The reliance on aerial surveys brings significant detection bias, particularly in Atlantic

conditions, likely leading to an underestimation of their presence. This is particularly evident when compared to established land-based observations that show these waters are used frequently. Neglecting to include or properly consider this data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based on assumptions instead of solid evidence. Furthermore, the lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, featuring significant internal inconsistencies and substantial gaps in evidence that undermine its conclusions. It fails to adequately demonstrate that internationally important seabird populations, many of which are already in decline, will not be adversely affected by the proposed development on the west coast of the Isle of Lewis. This area includes key foraging zones and migratory pathways, yet the assessment does not properly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction exists within the application; while the developer asserts that there will be no significant adverse effects, they also pursue a Habitats Regulations derogation case, which is only relevant where significant harm is anticipated. Such inconsistencies raise serious doubts about the credibility of the assessment and suggest that its conclusions lack the necessary supporting evidence.

The evidence presented is insufficient to assure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the significance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species that are experiencing severe decline, like Kittiwakes and Fulmars. Methodologies used in the assessment are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor poses an additional and substantial risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor are not adequately assessed, nor are the potential effects on species with relatively small global populations.

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

These deficiencies also constitute a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment's weaknesses in methodology, evidence, and internal consistency lead to the conclusion that it does not fulfill the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity surrounding the proposed development is severely lacking. It does not recognise the West Lewis coastline as a living cultural landscape, where elements such as environment, language, tradition, and community are all interconnected. Instead, the application simplifies heritage to isolated, static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, are treated inadequately. These cemeteries serve as active places of burial and spiritual practice. However, the assessment characterises them merely as static features, overlooking their continued significance and the development's potential impact on their surroundings. This misrepresentation leads to an incomplete cultural evaluation and dismisses their importance in community life.

Moreover, the application fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity but are notably absent from the assessment. This oversight prevents a proper understanding of the development's cultural implications.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which has a distinct cultural identity similar to that of an Indigenous People, has not been consulted in a meaningful way. The lack of a process for Free,

Prior and Informed Consent undermines the assessment's validity and overlooks the established principles of participation in matters affecting cultural and environmental interests.

A significant procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, making the decision unlawful.

These shortcomings put the proposal in conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to address both tangible and intangible heritage, as well as to acknowledge living cultural practices, deviates from policy requirements.

Overall, the inability to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not provide a sufficient foundation for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, wellbeing, and social impacts related to the proposal is significantly lacking, with transparency essential for a lawful evaluation being absent. Although the developer commissioned a Social Impact Assessment that included focus groups involving local residents, the full report remains unpublished. This creates a critical evidential gap, limiting both public understanding and the competent authority's capacity to grasp the full extent of social risks identified by the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement and are therefore grounded in reality, not speculation. However, the failure to disclose the complete assessment restricts adequate scrutiny of these findings, thereby hampering the ability to assess their significance during the decision-making process.

Moreover, there is indication that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, such impacts have not been properly integrated into the main application or afforded the necessary importance. The withholding of the entire Social Impact Assessment obscures the genuine human and social costs of the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and

functioning are at stake. By not providing the complete dataset, the application fails to establish a full evidential basis for weighing the balance of benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is imperative that developments promote positive health outcomes and avert harm. Nonetheless, the evidence available points to existing adverse effects that remain inadequately disclosed. Without the full assessment, it is impossible to confirm adherence to this policy.

The procedural implications of this situation are profound. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The application significantly underrepresents the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not adequately convey the level of impact or its significance, particularly given the sensitivity of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the concern that the visual impacts have been understated, which undermines the credibility of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between seascape, landscape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The

assessment treats these assets in isolation, rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, fundamentally altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This presents not only a visual impact but also a broader cultural and spatial harm that has not been adequately addressed in the application.

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

It is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Consequently, the resulting changes would be fundamental and permanent, unable to be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is not feasible to ascertain the

extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The application provides an inadequate assessment of fisheries and marine life, lacking a thorough evaluation of both ecological and socio-economic impacts. Off the West Lewis coast, there exists a vibrant marine ecosystem and an active fishing industry. However, the proposal does not convincingly show that these habitats and uses can be safeguarded without significant disturbance.

A critical flaw is the assumption that fishing activities can be moved without any negative effects. The application fails to provide proof that alternative fishing grounds are not only available but also accessible and capable of handling the additional strain. This gap is crucial, as displacing fishing could lead to overfishing in other areas and might have broader economic repercussions for the local fleet. Without a solid, evidence-based assessment, the repercussions for fisheries and local livelihoods remain unclear.

Moreover, the proposed project poses significant risks to marine species, especially due to underwater noise produced during construction. Prolonged high-energy hammer piling is expected to disturb marine life over large distances, impacting species like dolphins. There are serious concerns regarding the projected disturbance to a notable portion of the local bottlenose dolphin population. Yet, the application minimizes the importance of these impacts without adequate supporting evidence.

Furthermore, the application contains contradictions, as it acknowledges the necessity

of licences to allow harm to European Protected Species while simultaneously claiming the impacts are negligible. This inconsistency questions the reliability of the assessment and raises issues of compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

The evaluation also neglects to account for cumulative impacts resulting from various pressures such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately gauged.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to indicate that the development can coexist with current marine users or prevent unacceptable effects on marine biodiversity, thus hindering any conclusion that the proposal is sustainable.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies compromise the assessment, rendering it incomplete and unreliable. These shortcomings obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and fails to address the full extent of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are intrinsically linked; however, they are assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure traversing sensitive landscapes. This construction includes excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not present a comprehensive assessment of these impacts, which hinders the understanding of the project's overall environmental footprint.

By not adequately assessing onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be considered collectively. Nonetheless, the separation of offshore and onshore components means the combined impacts on peatlands, habitats, and communities remain poorly understood.

Furthermore, there are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not prove that these habitat impacts have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance, as the disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or to show that the overall carbon balance is advantageous.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, leading to questions about deliverability and lawful implementation.

From a policy perspective, the inability to assess the project as a whole and demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife within the Environmental Impact Assessment is a critical failure that must be addressed immediately. The West Lewis coastline is renowned for its exceptionally dark skies, which are essential not only for environmental quality but also for cultural identity and tourism value. The proposed introduction of permanent red aviation lighting, which will be visible over long distances, will create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to the area’s identity and the potential for growth in tourism sectors such as astro-tourism. The absence of such assessments leaves a significant gap in the overall landscape and environmental evaluation.

More alarmingly, there has been no consideration of the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel exhibit sensitivity to artificial lighting due to phototaxis, which can cause disorientation and elevate the risk of collisions. The lack of any lighting impact assessment or phototaxis study means there is no understanding of how aviation lighting may affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activity and related risks. Kittiwakes,

which might forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data results in a significant gap in comprehending ecological impacts.

Without a thorough evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this oversight contradicts the National Planning Framework 4 regarding the protection of natural areas and environmental quality. It further compromises the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

The assessment of tourism impacts within the application is notably inadequate and neglects to address the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a profound sense of remoteness. The application itself acknowledges that 86% of visitors are attracted by the scenery, yet it lacks a quantified analysis of how the introduction of large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution to the region.

The significance of tourism in the local economy is underscored by its substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, accounting for as much as 16% of the island's economy. Despite this impressive development, the application fails to simulate how the industrialisation of the seascape and the degradation of environmental quality could adversely affect Tourism Gross Value Added and the broader economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Moreover, the assessment neglects the essential role that environmental quality plays in bolstering tourism, including the critical importance of unspoiled landscapes and dark skies in enriching visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a significant gap in understanding the impacts on a recognized and growing segment of the local economy.

In an island community characterised by limited economic diversification, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefits. It also contradicts strategic objectives that prioritise tourism as a key growth sector and lacks sufficient evidence for the competent authority to properly assess the economic ramifications of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors driving visitor behaviour, and account for the island's economic dependency culminates in a significant evidential gap. This deficiency inhibits a comprehensive appraisal of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

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

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

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

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

not been adequately assessed, thereby obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

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: 7774CEDA

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, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and a near-pristine environment that reflects a strong cultural identity. However, the proposal raises fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

A review of the Environmental Impact Assessment Report and supporting documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is both limited and inconsistent, and significant aspects of the proposal remain undefined. The use of a flexible design framework further complicates the ability to assess likely significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are substantive policy conflicts associated with 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 does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests for consent and impair the ability of the competent authority to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate for supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to offer a comprehensive and transparent account of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking commitments to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders a reliable worst-case scenario analysis. This compromises the assessment's integrity and prevents both the public and the competent authority from grasping the true scale of environmental impacts.

There is an overreliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is sought with the assumption that environmental damage will be remedied later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contravenes the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established prior to decision-making.

The application also contains notable evidential shortcomings, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not satisfy the evidential threshold required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment submitted concerning marine ecology and protected species is fundamentally inadequate and fails to furnish a complete and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically active marine ecosystem, yet the existing baseline data is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, and habitat utilisation of

various species. Consequently, the assessment lacks a solid evidential basis necessary for evaluating the potential impacts.

One significant shortcoming pertains to otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential consequences of construction disturbance, noise, and increased activity have not been thoroughly evaluated. This deficiency undermines any assertions regarding the absence of significant effects on this species.

The assessment of basking sharks also exhibits serious shortcomings, as reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence, especially when compared to established land-based observations that indicate regular use of these waters. The failure to include or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws indicate that conclusions regarding negligible or non-significant effects are predicated on assumptions rather than on robust evidence. Furthermore, the lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, which encompasses seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not appropriately identified or assessed protected species. The level of uncertainty involved prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, the granting of consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These inadequacies obstruct a thorough evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented is fundamentally unreliable, characterised by significant gaps in evidence and internal inconsistencies that severely undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the

proposed development, yet the assessment inadequately evaluates the risks of displacement, collision, or habitat loss.

Notably, there is a critical contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case, which is only needed when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available.

Furthermore, the assessment does not adequately show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully recognised, and reliance on modelling approaches introduces considerable uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates an additional and severe risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality in this corridor, nor does it consider the potential impacts on species with relatively small global populations.

Regulatory compliance is also in question; the application does not fulfil the evidential threshold required to conclude there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, means that the necessary standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Moreover, these identified deficiencies represent a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment is characterised by unreliability due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a thorough evaluation of potential impacts and culminate in the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is markedly deficient, as it overlooks the West Lewis coastline as a dynamic cultural landscape where the

environment, language, tradition, and community are deeply interwoven. The application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the handling of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices; however, the assessment treats them merely as static features, failing to account for their continued usage and the implications of development on their surroundings. This misrepresentation leads to an incomplete analysis of cultural effects, disregarding their importance to community life.

Moreover, the application neglects to examine intangible cultural heritage, which includes the Gaelic language, local traditions, and the historical bond between the community and the coastal landscape. These aspects are crucial to the area's identity but are entirely omitted from the assessment, constituting a significant oversight. Without addressing these elements, the cultural ramifications of the development remain inadequately understood.

Concerns extend to community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity, recognised as having characteristics of Indigenous Peoples, yet no Free, Prior and Informed Consent process has been initiated. The lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles of participation in matters concerning cultural and environmental interests.

Another critical procedural lapse is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone precludes a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the preservation of historic assets and locations. The failure to recognise both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear deviation from policy requirements.

In sum, the neglect to evaluate living heritage, intangible cultural significance, community rights, and statutory duties creates a substantial evidential gap. The cultural impacts of the development have not been adequately considered, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity.

This area is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. Introducing such industrial structures in close proximity to the shoreline would establish a persistent industrial presence, fundamentally altering the unique character of the environment and leading to a permanent transformation of the landscape.

The application fails to adequately capture the magnitude of the visual changes anticipated. The size and proximity of the turbines would overshadow views from nearby residential areas, historic sites, and popular coastal locations, negatively impacting visual amenity and diminishing the area's defining characteristics of naturalness and remoteness. The existing assessment does not effectively communicate the significance of these impacts within the context of this sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This suggests a potential understatement of the visual impact, which compromises the reliability of the assessment.

Moreover, the assessment does not adequately evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The current assessment treats these heritage assets in isolation, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally changing how heritage assets are experienced and severing their connection to the natural horizon. This alteration represents not just a visual impact but also a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of transformation proposed conflicts with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with relevant policies.

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

Collectively, the assessment fails to represent accurately the scale of the impacts, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to adequately assess construction and pollution risks, resulting in an incomplete evaluation of potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment, yet the application does not provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that are to be developed post-consent, limiting the ability to assess their adequacy or effectiveness.

This dependence on undefined future measures is especially concerning given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and essential habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges various risks, including sediment mobilisation and accidental spills, it fails to detail how these incidents will be prevented, managed, or monitored.

Moreover, there is considerable uncertainty surrounding the extent and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty similarly extends to the potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By deferring critical contingency planning to a post-consent phase, the proposal obstructs the evaluation of whether sufficient safeguards are in place to tackle pollution incidents. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of vital environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is essential to assess likely significant effects and mitigation measures before granting consent, and the absence of such information renders lawful determination impossible. Furthermore, the application does not demonstrate compliance with necessary policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a robust evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal fails to adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

One major concern is the assumption that fishing activities can be displaced without negative consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of supporting any additional pressure. This is a critical omission, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause significant disturbance over large distances, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application appears to downplay the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, acknowledged while simultaneously claiming the impacts are negligible. This contradiction raises doubts about the credibility of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is anticipated to the extent that legal authorisation would be necessary.

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

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application all contribute to an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

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]

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: EB8982E0

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its associated documents reveals significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine conditions, and strong cultural heritage. The nature, scale, and proximity of the proposed development raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is evident that crucial environmental data is absent, baseline information is both limited and inconsistent, and several vital aspects of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by reliable evidence.

There are distinct and significant policy inconsistencies present. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and jeopardise the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the project is concerning, with large turbines positioned in close proximity to the shore, leading to significant worries about landscape capacity, visual impact, and environmental effects. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrate that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report falls short in its capacity to provide a full and transparent account of the potential environmental consequences of the proposed

development. One critical issue is the reliance on a flexible Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations of turbines. This introduces significant uncertainty and hampers the assessment's integrity, as it obscures the potential impacts that the final development may entail. Consequently, both the public and the competent authority are unable to grasp the true extent of the environmental effects involved.

Moreover, the application places considerable emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent under the premise that environmental harm will be mitigated post-consent precludes any substantive evaluation of these measures' effectiveness or the assessment of residual impacts. This postponement of vital information contradicts the core aim of the Environmental Impact Assessment process, which mandates that significant effects and mitigation strategies must be clearly identified before a determination can be made.

The report also exhibits significant evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without adequate supporting data. The lack of comprehensive information obscures understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential criteria set forth by the Habitats Regulations, which require the exclusion of adverse effects beyond reasonable scientific doubt. The precautionary principle must be engaged, especially regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly in areas concerning biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if suitable safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data leads to an Environmental Impact Assessment Report that is both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental impacts, leaving the competent authority unable to make a fully informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The West Lewis coastline is particularly sensitive, making the proximity to shore a crucial factor in determining environmental impact. Unfortunately, the assessment of alternatives within the application is materially inadequate and does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution.

This narrative approach fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly demonstrate that the developer has seriously considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened.

These deficiencies also extend to the evaluation of cable routing and landfall assessment, as there is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy to avoid such impacts and the insufficient comparative analysis highlight that mitigation by design has not been effectively utilised, leading to an over-reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding the assessment of marine ecology and protected species, which is notably deficient and fails to deliver a comprehensive or reliable understanding of the ecological receptors present in the West Lewis coastal environment. This marine system is recognised as being highly sensitive and biologically active, yet the baseline data gathered is inadequate, and the methodologies employed do not effectively capture essential information on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential foundation for evaluating potential impacts.

A critical shortfall in the assessment relates to otters, a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment does not adequately consider the potential impacts of construction disturbance, noise, and increased activity. This lack

of thorough analysis compromises the conclusions drawn regarding the absence of significant effects on this species.

Moreover, there are further shortcomings in the assessment of basking sharks, particularly due to an overreliance on aerial surveys, which creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate these waters are used frequently. The failure to incorporate or properly consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings result in claims of negligible or non-significant effects being founded 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 situation creates uncertainty about the actual scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. It has been identified that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The development is situated within crucial foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A major inconsistency arises within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The

assessment does not sufficiently confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not adequately considered, and the dependence on modelling approaches introduces a level of uncertainty, particularly concerning species facing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain insufficiently understood.

The location of turbines within a recognised migratory corridor adds another significant risk, effectively posing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely flawed, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a narrow perspective, treating heritage as a collection of separate, unchanging assets rather than recognising their ongoing social, cultural, and spiritual relevance to the community.

A significant shortcoming is evident in the handling of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and places of spiritual significance, yet the assessment erroneously classifies them as static entities, neglecting their current use, meaning, and the development's effects on their surroundings. This incorrect portrayal leads to an incomplete understanding of cultural impacts and disregards their vital role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the

Gaelic language, traditions, and the enduring relationship the community has with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the assessment, marking a significant gap. Without recognising these factors, the true cultural impact of the development remains inadequately understood.

There are also serious concerns regarding community rights and involvement. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

A critical procedural oversight is the failure to produce a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to examine the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings position the proposal in direct opposition to the National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap that affects the ability of both the public and the competent authority to understand the social risks identified through the developer's own research. This lack of transparency not only undermines the Environmental Impact Assessment process but also prevents a complete understanding of the social, economic, and health impacts essential for developments of this scale.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. However, without access to the complete assessment, the findings cannot be properly scrutinised, which limits the ability to gauge their significance in the decision-making process.

Furthermore, there is evidence from the developer's own findings indicating that the

proposal poses a direct threat to community identity and cohesion, with a risk of "cultural loss" highlighted. Nonetheless, these impacts have not been adequately integrated into the main application nor afforded appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social cost of the development, reflecting a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with policy cannot be established.

The procedural implications of this non-disclosure are significant, as the competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. Consequently, this omission within the application reinforces the conclusion that it lacks sufficient information and fails to support a lawful determination. Taken together, the failure to disclose the full assessment and the evidence of existing adverse impacts renders the evaluation incomplete and unreliable.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape in the application is inadequate and does not accurately portray the extent of change nor the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, lack of development, and pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shoreline would establish a continuous and overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

There are significant concerns regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints might not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning notable cultural heritage sites and valuable landscapes. This raises the risk that the assessment has understated the magnitude of visual impact, which compromises the reliability of the findings.

Furthermore, the application fails to recognise the interconnectedness of the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities, neglecting their interdependence, and thus providing an incomplete picture 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 represents not only a visual impact but also a broader cultural and spatial detriment that has not been adequately considered within the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural spaces and historic assets. The scale of the proposed change conflicts with the requirement to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case assessment further calls into question compliance with relevant policies.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be assertive and inescapable. Consequently, the change introduced would be fundamental and permanent, not amenable to acceptable mitigation efforts.

In summary, the assessment fails to accurately capture the magnitude of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a dependable evaluation and affirm the conclusion that the proposal is at odds with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline features clean coastal waters and important habitats that are vulnerable to disturbance and contamination. The proposal, which involves significant seabed preparation and installation activities in a high-energy Atlantic environment, lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent is granted. This approach raises concerns, as it prevents a thorough assessment of these measures' adequacy and effectiveness.

The application acknowledges various risks, including sediment mobilisation and accidental chemical or oil spills, yet it does not offer sufficient detail on how these issues will be prevented, controlled, or monitored. Furthermore, 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, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts, which could affect sensitive marine species and habitats already identified in the broader assessment.

The omission of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent, the application hampers the evaluation of whether appropriate safeguards exist to address pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation measures prior to

granting consent; without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively result in a materially deficient assessment. These issues hinder a robust evaluation of construction and pollution risks, further substantiating the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life lacks depth and fails to provide a solid evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats can be preserved or maintained without considerable disruption.

A critical concern is the assumption that fishing activities can simply be relocated without repercussions. The application does not present evidence showing that alternative fishing grounds are viable, accessible, or able to support the additional strain. This significant omission raises alarms, as the displacement of fishing could lead to overfishing in other areas, potentially harming the local fishing fleet's economic stability. Without a thorough and evidence-based evaluation, the repercussions on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses substantial threats to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended duration is likely to cause disturbances across vast distances, impacting species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimizes the seriousness of these effects without adequate substantiation.

The application exhibits a clear inconsistency by acknowledging the necessity for licences to authorise harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal approval.

Additionally, the assessment neglects to consider cumulative impacts that arise from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. Absent a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that

the proposed development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, thereby undermining any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, as it fails to consider the entire scope of the integrated project, particularly the interrelation between the offshore turbines and the onshore works. This disjointed approach results in an incomplete understanding of the environmental and socio-economic impacts. The onshore components, which include cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure, involve excavation through deep peat areas, notably within Barvas Moor. This area is not only a significant carbon store but also an ecologically sensitive habitat. The current application does not offer a comprehensive evaluation of these impacts, leading to a lack of clarity regarding the overall environmental footprint of the project.

Moreover, by omitting or postponing the assessment of onshore impacts, the application hinders a thorough evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project elements must be examined collectively; however, the distinct treatment of offshore and onshore aspects prevents a full understanding of the combined impacts on peatlands, habitats, and local communities. There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application falls short in demonstrating that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a significant evidential gap in biodiversity protection.

Concerns also arise regarding the carbon balance as disturbing peatland may release stored carbon, potentially creating a carbon debt that contradicts renewable energy goals. The application inadequately addresses this critical issue and does not establish that the overall carbon balance remains favourable. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The absence of evidence regarding the initiation of necessary consents or processes calls into question the project's deliverability and lawful implementation.

From a policy perspective, the disjointed assessment and the failure to protect peatlands, habitats, and land use interests contradict both the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be mitigated further undermines the credibility of the application. Collectively, the separation of project components, the lack of a comprehensive assessment, and insufficient evidence concerning environmental and land use impacts render this

section of the application incomplete and untrustworthy, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible across long distances, resulting in a continuous and intrusive effect on the western horizon, fundamentally altering the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant due to the importance of dark skies to the area's identity and the growing tourism sector, including astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment regarding this lighting or a phototaxis study, thus failing to evaluate the potential effects on these species or the risk of increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment fails to capture the nocturnal activities or associated risks. Species like Kittiwakes, which might forage or migrate during the night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains uncertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not achieved, which engages the precautionary principle and obstructs lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time settings is a fundamental component of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal raises significant concerns that cannot be overlooked. It fundamentally fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the issues that led to the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a key factor. Presently, it is submitted within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential foundation upon which the application stands. There are inadequacies in the baseline data, and the design envelope remains undefined. Furthermore, the proposed reliance on unspecified mitigation measures and the omission of key impact pathways—including those affecting nocturnal wildlife, onshore infrastructure, and tourism—render the Environmental Impact Assessment incomplete. As a result, it hinders a comprehensive understanding of significant effects or residual impacts.

The proposal also faces procedural shortcomings, particularly the absence of a compliant Island Communities Impact Assessment, which contravenes the statutory duty established by the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is a substantial omission. These deficiencies obstruct the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, ultimately deeming the application unsuitable for determination.

Contradicting the National Planning Framework 4, the proposal does not adequately safeguard biodiversity, natural places, or cultural heritage. It fails to demonstrate that impacts on health and wellbeing are acceptable, nor can it evidence a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been sufficiently conducted, concealing effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals contain inconsistencies. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle and prevents a lawful determination of acceptable impacts.

Moreover, the proposal would induce profound and irreversible alterations to a delicate landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruption of cultural and visual relationships, along with the adverse effects on tourism, represent permanent changes that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination, both procedurally

and substantively. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs the possibility of a lawful, evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes the appropriate regulatory measures to mandate the provision of the necessary information.

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

Additional Comments

Stop destroying our beautiful country and wildlife

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: 4D9E8513

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

Dear Sir/Madam

This letter represents a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment requirements. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and its accompanying documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly pristine environment, and rich cultural heritage. The dimensions, closeness to the coast, and design of the wind farm present serious questions about its alignment with statutory obligations, national policies, and the tenets of sustainable development.

A primary concern is the lack of adequate evidence supporting a lawful decision. Important environmental data is absent, baseline information is both limited and inconsistent, and critical components of the proposal are not clearly defined. The flexible design framework employed hinders a comprehensive understanding of the likely significant impacts, and the reliance on unspecified mitigation measures precludes a proper evaluation of their effectiveness. Consequently, the documentation fails to provide a complete or informed overview of potential environmental, cultural, or community consequences, making assertions of negligible or non-significant effects unsubstantiated by strong evidence.

Additionally, there are substantial conflicts with existing policies. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment framework, and the National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, safeguard climate interests, or maintain environmental integrity. These discrepancies are critical as they directly impact the statutory tests necessary for granting consent and compromise the ability of the relevant authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines set in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, the dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking, failing to deliver a comprehensive, transparent, or dependable overview of the potential environmental impacts of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific dimensions, layouts, or configurations of the turbines, introduces considerable uncertainty. This situation hampers the ability to apply a worst-case scenario consistently and jeopardises the integrity of the assessment, meaning that the impacts outlined may not correspond to the development that will ultimately be constructed. As a result, both the public and the competent authority are unable to fully comprehend the true extent of the environmental effects.

Furthermore, the application leans significantly on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent on the premise that environmental harm will be addressed later denies any meaningful evaluation of the effectiveness of these measures or an accurate assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation must be clearly identified prior to determination.

The report also presents notable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies engender uncertainty about the scale and significance of impacts, particularly where conclusions indicating negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that fails to meet statutory requirements.

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

Overall, the reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data lead to an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species presents significant deficiencies, lacking a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is noted for its sensitivity and biological activity, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

A notable gap is the inadequate consideration of otters, a species protected under European law. The application does not appropriately recognise or assess their active utilisation of coastal regions for foraging and movement. This oversight concerning their core foraging range and behavioural patterns results in an insufficient evaluation of the potential effects from construction disturbances, noise, and increased activity. Such shortcomings call into question the conclusions drawn regarding the lack of significant effects on this species.

Further issues arise with the assessment of basking sharks, where reliance on aerial surveys creates a considerable detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, particularly in light of established land-based observations that indicate these waters are frequently used. The failure to integrate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological flaws in the assessment result in conclusions regarding negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty surrounding the true extent of risk to marine species and habitats is concerning.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an assessment that is fundamentally unreliable. These shortcomings impede a rigorous evaluation of impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its potential impact on seabird populations, particularly given the west coast of the Isle of Lewis is home to

internationally important seabird species that are already experiencing declines. The ornithological assessment submitted with the application is fundamentally flawed, marked by significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The key foraging areas and migratory pathways that the development encroaches upon have not been adequately evaluated for implications related to displacement, collision risk, or habitat loss.

A critical contradiction is evident in the application, wherein the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is warranted only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions presented lack adequate support from the available evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is insufficiently addressed, and reliance on modelling approaches introduces further uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially due to incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor presents an additional and significant risk by creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term consequences of sustained mortality within this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to provide the evidence necessary to confirm that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means the standard of proving beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion in support of consent. Furthermore, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to adequately demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal contradictions, methodological weaknesses, and inadequate evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the overarching conclusion that the application does not fulfil the statutory requirements essential for a lawful determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical flaw that undermines the application's validity. The developer's

commissioning of a Social Impact Assessment, which included focus groups with local residents, has not resulted in the publication of the full report. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the social risks identified through the developer's own research.

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

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

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

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

The procedural implications of these shortcomings are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission in the application that fails to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This situation hinders a lawful determination and further underscores that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is insufficient and does not truly capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon

and undeveloped nature, which contribute to a strong sense of remoteness. Large-scale turbines placed near the shoreline would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct impact on visual amenity and detract from the naturalness and sense of remoteness that define the area. The assessment does not accurately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that these viewpoints might not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the scale of visual impact may have been understated, which calls the reliability of the assessment into question.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated rather than interdependent results in a poor assessment of impacts on their setting and cultural significance.

The introduction of industrial elements to 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 issue but also broader cultural and spatial harm that has not been sufficiently analysed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of change is at odds with the requirement to maintain landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. Consequently, the change would be fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks essential details for assessing construction and pollution risks, failing to meet the necessary standards for evaluating likely environmental impacts. It involves significant seabed preparation and installation work in a high-energy Atlantic environment, yet no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans have been submitted. Instead, the application depends on unspecified mitigation and contingency measures to be developed after consent, which obstructs any meaningful assessment of their effectiveness or adequacy.

This reliance on undefined future measures is particularly alarming due to the sensitivity of the West Lewis coastline, known for its clean coastal waters and crucial habitats that are susceptible to sediment disturbance and pollution. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it does not furnish adequate information on how these risks will be prevented, controlled, or monitored.

There is considerable uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats previously identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application hinders the evaluation of whether proper safeguards are established to address pollution incidents. This approach introduces procedural risk and weakens the ability of the competent authority to review environmental protection measures before making a determination.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination is unachievable. Additionally, the application fails to demonstrate compliance with policy standards concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application lacks a robust evaluation of the ecological and socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a

diverse marine ecosystem and support an active fishing industry. However, the proposal fails to adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

One major concern is the assumption that fishing activities can be displaced without negative consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of supporting any additional pressure. This is a critical omission, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to cause significant disturbance over large distances, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application appears to downplay the significance of these effects without adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, acknowledged while simultaneously claiming the impacts are negligible. This contradiction raises doubts about the credibility of the assessment and raises issues of compliance with the Habitats Regulations, especially where harm is anticipated to the extent that legal authorisation would be necessary.

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

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

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application all contribute to an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves significant onshore infrastructure, which includes cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure through sensitive landscapes. These activities require excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, hindering an understanding of the project's overall environmental footprint.

The separation of offshore turbines and onshore works leads to an incomplete assessment, failing to consider the cumulative effects that arise from what should be treated as a single integrated project. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing proper evaluation of all components together as required by the Environmental Impact Assessment process. Consequently, the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are serious risks to sensitive habitats such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate measures for avoidance have been implemented, indicating a clear evidential gap in biodiversity protection.

Concerns also arise regarding the carbon balance, as the disturbance of peatland may release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this critical issue, leaving it unclear whether the overall carbon balance is genuinely beneficial.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights, with the application lacking evidence of necessary consents or processes being initiated. This raises serious questions about deliverability and the lawful implementation of the project.

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

In summary, the separation of project components, coupled with the absence of a thorough assessment and a lack of evidence regarding environmental and land use impacts, renders this aspect of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally affects the night-time environment of the West Lewis coastline, which is distinguished by exceptionally dark skies that contribute significantly to environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area’s identity and to emerging tourism sectors, such as astro-tourism, this omission is significant and results in a clear gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to assess how aviation lighting may affect these species or potentially increase mortality rates.

The reliance on daytime survey data in the ornithological assessment does not adequately capture nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the risk remains unassessed. The absence 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 ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thereby engaging the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the broader assessment of landscape and seascape impacts, as the night-time character is integral to the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. The issues highlighted in this application echo those from the 2008 refusal of the Lewis Wind Power proposal, where the scale of industrialisation was deemed

unacceptable. Now, the proposal is presented against a stronger policy backdrop that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A comprehensive and reliable evidential basis for the proposal is lacking. There are significant gaps in baseline data, it employs an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, crucial impact pathways concerning nocturnal wildlife, full onshore infrastructure, and effects on tourism have been omitted. As a result, the Environmental Impact Assessment is incomplete, making it impossible to fully understand the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment is a material omission that hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. There has also been insufficient assessment of the cumulative effects of offshore and onshore elements, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments conducted on marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

Ridiculous location for such an installation.

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: CCDE0A92

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which is being processed under the relevant marine licensing and Environmental Impact Assessment regulations. The objection is founded on a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. This development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural identity. The proposal's scale, proximity, and design raise essential 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 decision. It is missing critical environmental data, with baseline information being limited and inconsistent. Additionally, vital elements of the proposal remain undefined. The use of a flexible design framework hinders a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are evident and serious conflicts with existing policies. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposal is unprecedented for this area, with large turbines positioned near the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. The combination of inadequate information, reliance on undefined mitigation, weaknesses in evidence, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable analysis of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope,

lacking firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the assessment's integrity and means that the impacts outlined may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to gauge the true environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally improper and contradicts the intentions of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be clearly defined prior to any decision-making.

Significant evidential shortcomings are present, including gaps in baseline data, methodological limitations, and reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. A lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, including provisions regarding biodiversity protection and environmental integrity, as it is unclear whether impacts have been comprehensively assessed or if adequate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of defined mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These issues obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors within the West Lewis coastal environment. This region constitutes a highly sensitive and biologically rich marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active utilisation of coastal regions for foraging and movement. The disregard for their core foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and heightened activity remain inadequately assessed. This oversight seriously undermines any conclusions regarding the absence of significant effects on this species.

Further shortcomings are apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to include or appropriately consider such vital data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are predicated on assumptions rather than robust evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been identified or assessed in a thorough manner. The introduced uncertainties prevent the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment represents a significant evidential gap that undermines the evaluation of the proposed development. The developer engaged local residents through focus groups, yet the complete report remains unpublished. This lack of transparency obstructs both public understanding and the competent authority's ability to fully grasp the social risks highlighted in the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due

to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative. However, without access to the full assessment, there is inadequate scrutiny of the findings, which limits the assessment of their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with findings indicating potential “cultural loss” that have not been adequately considered in the main application. The failure to fully integrate these impacts diminishes the acknowledgment of the true human and social costs associated with the development.

The withholding of the full Social Impact Assessment compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health implications is crucial for developments of this magnitude, particularly when they may impact community character and functioning. By not providing the entire dataset, the application lacks a complete evidential basis for balancing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, existing adverse effects, which have not been fully disclosed, suggest a failure to meet this requirement. Without the complete assessment, adherence to this policy cannot be validated.

The procedural implications of this situation are profound. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission is a significant shortfall within the application and fails to satisfy the evidential demands of the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal to introduce large-scale turbines near the West Lewis coastline presents immediate and serious risks to both the environment and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped landscape, and a profound sense of remoteness. The placement of turbines in such proximity to the shoreline would create a persistent industrial presence, fundamentally transforming the landscape in a permanent and irreversible manner.

The assessment of visual impacts associated with this development is critically flawed, failing to convey the full extent of the proposed changes. The size and location of the turbines would lead to their dominance in views from residential areas, historic sites,

and popular coastal locations. Consequently, this would severely diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The lack of an adequate representation of this impact, particularly within such a delicate landscape, is deeply concerning.

Moreover, there are significant methodological shortcomings regarding the selection and presentation of visual viewpoints. Current evidence indicates that the chosen viewpoints do not effectively encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the overall reliability of the assessment.

Additionally, the evaluation fails to address the intricate relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections with the Atlantic horizon. By treating these heritage assets as isolated elements, the assessment neglects their interdependence, resulting in an incomplete understanding of their settings and cultural importance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which mandates the protection of natural environments and historic sites. The anticipated changes are at odds with the need to preserve landscape character, visual amenity, and the context of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertions of compliance with policy requirements.

It is evident that the impacts identified are not capable of effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and overwhelmingly dominant. The resulting changes are thus fundamental and permanent, incapable of being reduced to an acceptable level through mitigation strategies.

In summary, the assessment inadequately represents the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this important landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding nocturnal wildlife and dark skies represents a significant evidential gap in the Environmental Impact Assessment. This gap is crucial, considering that the West Lewis coastline is known for its exceptionally dark skies, which play an essential role in environmental quality, cultural identity, and

tourism value. The proposal would introduce permanent red aviation lighting, which would be visible over considerable distances. This would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the significance of dark skies to the area's identity and the potential for emerging sectors like astro-tourism, this omission is noteworthy. It results in a substantial gap in the overall assessment of landscape and environmental impacts.

Moreover, there is no evaluation of the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, leading to disorientation and a heightened risk of collision. The application lacks a lighting impact assessment or any phototaxis study, thereby failing to consider how aviation lighting may affect these species or increase their mortality rates.

The reliance on daytime survey data within the ornithological assessment further complicates matters, as it does not adequately capture nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this concern has not been assessed. The lack of site-specific night-time data constitutes a critical shortcoming in understanding ecological impacts.

Without a thorough evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and obstructing a lawful determination.

Additionally, from a policy standpoint, this omission is at odds with National Planning Framework 4, which pertains to the protection of natural places and the preservation of environmental quality. It further undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the overall ecological framework.

In summary, the lack of assessment regarding dark skies and nocturnal wildlife highlights a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders this application incomplete and unable to support a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed, failing to meet the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. It replicates the core issues that led to the

refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current application is put forth under a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential basis for the determination of this application. It lacks comprehensive baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Furthermore, significant impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, the implications of full onshore infrastructure, and impacts on tourism. The Environmental Impact Assessment is therefore incomplete and fails to adequately convey the likely significant effects or residual impacts.

Additionally, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018. There is also a significant omission regarding the full disclosure of the Social Impact Assessment. Such deficiencies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal is in direct violation of National Planning Framework 4, which requires the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and fails to provide evidence of a net economic benefit due to a lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, leaving unclear the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4D57D7E4

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely untouched environment, and vibrant cultural identity. There are pressing concerns regarding the proposal's scale, proximity to the shore, and overall design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for lawful determination. Critical environmental data is absent, with baseline information being both limited and inconsistent, and many key components of the proposal are inadequately defined. The reliance on a flexible design framework complicates the ability to ascertain significant environmental effects, and the unspecified mitigation measures hinder any meaningful assessment of their effectiveness. Consequently, the available documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

Moreover, the proposal presents clear and significant conflicts with established policies. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural environments, and public health. The application does not convincingly demonstrate adherence to national requirements aimed at safeguarding biodiversity, addressing climate considerations, and maintaining environmental integrity. These discrepancies directly affect the statutory criteria for consent and compromise the competent authority's ability to determine whether the development is acceptable under policy guidelines.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shoreline, raises considerable issues related to landscape capacity, visual impact, and broader environmental repercussions. Collectively, the lack of comprehensive information, dependence on undefined mitigation strategies, evidential shortcomings, and significant policy non-compliance illustrate that the application is incomplete and insufficient for lawful determination. Under these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent and reliable account of the likely environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, creates significant uncertainty. This lack of commitment undermines the integrity of the assessment and means that the impacts presented may not accurately reflect the final development. As a result, both the public and the competent authority cannot fully understand the true extent of environmental effects.

The application depends heavily on mitigation measures, monitoring strategies, and management plans that have not been clearly defined. Seeking consent on the assumption that environmental harm will be managed later prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of crucial information until after consent is granted is procedurally unacceptable and contradicts the goals of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation should be established prior to decision-making.

Moreover, there are serious gaps in evidence, including incomplete baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. The insufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot meet statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not demonstrated that impacts have been fully assessed or that suitable safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide a full understanding of the ecological receptors in the West Lewis coastal environment. This area is sensitive and biologically active, yet the

baseline data remains inadequate. The methodologies used do not effectively capture the presence, behaviour, and habitat use of species in this marine system. Consequently, the assessment does not establish a solid evidential basis for impact evaluation.

A significant shortcoming is the omission of otters, which are a European Protected Species. The application does not adequately recognise their active foraging and movement within coastal areas. By neglecting their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased activity have not been properly assessed. This lack of assessment undermines conclusions regarding the absence of significant effects on otters.

The assessment of basking sharks also exhibits deficiencies, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This approach likely leads to an underestimation of their presence, especially when compared to established land-based observations indicating frequent use of these waters. The failure to include or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The insufficient baseline data limits the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, engaging the precautionary principle. Therefore, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues hinder a robust evaluation of the impacts on marine ecology and protected species and highlight that the application does not have a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, characterised by significant gaps in evidence and inconsistencies that undermine its conclusions. Located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations are already in decline, the application fails to convincingly demonstrate that these species will remain unaffected. There is an evident lack of robust evaluation regarding the implications of displacement, collision risk, and habitat loss for these birds.

A notable contradiction arises within the application itself, as the developer asserts

that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically warranted only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn lack adequate support from the underlying evidence.

The assessment does not sufficiently address the potential impacts on seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces considerable uncertainty, especially for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in instances where baseline data is insufficient and behavioural responses are inadequately understood.

The placement of turbines within a recognised migratory corridor poses an additional and serious risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. There is inadequate assessment of the long-term consequences of sustained mortality within this corridor, nor is there a thorough examination of the potential effects on species with relatively small global populations.

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

Moreover, the identified deficiencies reflect a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment lacks reliability due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment is a significant evidential gap that hinders both public understanding and the ability of the competent authority to evaluate the potential social risks associated with the proposal. While the developer did commission this assessment, which included focus groups with local residents, the lack of transparency surrounding its findings raises serious concerns.

Available summaries highlight that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the complete assessment, there is an impediment to properly scrutinising the findings and understanding their significance within the context of decision-making.

Moreover, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s own findings. Yet, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs linked to the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning are at stake. The absence of the full dataset means that the application does not provide a complete evidential basis for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to support positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline poses an immediate risk of creating a continuous industrial presence that would fundamentally alter this character. This transformation of the landscape would be permanent and irreversible.

The application fails to adequately represent the magnitude of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would erode the

essential qualities of naturalness and remoteness and significantly impact visual amenity. The assessment does not convey the true level of this impact or its significance within such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the application overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. Treating these as isolated assets neglects their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This impact transcends visual implications, introducing broader cultural and spatial harm that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment weakens any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks comprehensive detail regarding construction and pollution risks, failing to allow for a proper evaluation of potential environmental effects. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet fully developed Construction Environmental Management Plans and Pollution Prevention Plans are absent. Instead, the application depends on mitigation and contingency measures that are intended to be developed after consent has been granted, which hampers any meaningful assessment of their adequacy and

effectiveness.

This dependence on undefined future measures raises serious concerns, particularly given the vulnerability of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that could be harmed by sediment disturbance and contamination. Although the application identifies risks such as sediment mobilisation and potential chemical or oil spills, it fails to present adequate information on how these risks will be prevented, managed, or monitored.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from the disturbance of the seabed and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are established to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to appraise environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation measures be assessed prior to granting consent, and the absence of such information renders a lawful determination impossible. The application also fails to showcase adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents serious deficiencies in its assessment of fisheries and marine life, which fails to adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these essential uses and habitats can be preserved without causing significant disruption.

A critical flaw in the application is the assumption that displacing fishing activities will not have consequences. There is a lack of evidence regarding the availability or accessibility of alternative fishing grounds that could support the additional pressure.

This gap in the assessment is significant, as it poses the risk of overfishing in other areas and may lead to broader economic ramifications for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and the livelihoods of those who depend on them remain unclear.

The proposal introduces notable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged high-energy hammer piling is expected to disturb marine life over large distances, with particular concern for species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application downplays these effects without providing adequate supporting evidence.

Moreover, the application contains an internal inconsistency, as it acknowledges the need for licenses to allow harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby failing to confirm that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a significant challenge due to its fragmented assessment of onshore infrastructure, which is insufficient and does not account for the entirety of impacts associated with the integrated project. The offshore turbines and onshore works are interdependent, yet they are evaluated in isolation, leading to an incomplete understanding of the environmental and socio-economic consequences of the project.

Key onshore elements of the proposal encompass cabling that crosses protected moorland, the construction of a substation close to Stornoway, and the creation of access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, especially within Barvas Moor, an important

carbon store and ecologically significant habitat. The lack of a thorough assessment regarding these impacts results in an inadequate comprehension of the project's overall environmental footprint.

This omission of onshore impact assessments prevents a proper evaluation of cumulative effects, as the Environmental Impact Assessment process mandates that all project components be considered collectively. The disjointed analysis of offshore and onshore elements obscures the understanding of combined impacts on peatlands, habitats, and local communities.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to establish that impacts on these critical habitats have been thoroughly evaluated or that adequate avoidance measures have been incorporated. This situation leads to a significant evidential gap concerning biodiversity protection.

Concerns also arise around the project's carbon balance. The disruption of peatland can release sequestered carbon, which might create a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or confirm that the overall carbon balance remains advantageous.

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

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

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts culminate in an incomplete and unreliable application, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, creates an intrusive "wall of light" effect across the western horizon. This alteration to the night-time environment is not addressed in terms of its impact on visual amenity, landscape character, or the experiences of both residents and visitors. Given the relevance of dark

skies to local identity and emerging sectors such as astro-tourism, this omission is particularly concerning.

Moreover, the application neglects to evaluate the impacts on nocturnal wildlife, which is crucial given that species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting. Phototaxis can lead to disorientation and increased risk of collision for these species. The absence of any lighting impact assessment or phototaxis study means there is no consideration of how aviation lighting could affect these species and potentially increase mortality rates.

This critical oversight is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and related risks. Species like Kittiwakes, which might forage or migrate at night, are equally at risk of disorientation from artificial lighting; however, this risk remains unassessed. Without site-specific night-time data, a fundamental understanding of ecological impacts is lacking.

Consequently, without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and thereby hindering a lawful determination.

From a policy perspective, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts since the character of night-time environments is an essential aspect of the overall landscape.

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

TOURISM

The economy of the Isle of Lewis significantly relies on tourism, which has expanded from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this importance, the application in question fails to adequately assess the potential economic and social impacts on this vital sector. While it is noted that 86% of visitors are attracted by the area's scenery, there is no quantified analysis regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Moreover, the assessment overlooks the critical relationship between environmental quality and tourism. The unspoiled landscapes, dark skies, and sense of remoteness are essential to the visitor experience, particularly for burgeoning sectors such as

nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortfall, leaving a significant void in understanding the implications for an increasingly recognised component of the local economy.

In addition, the absence of a comprehensive Island Communities Impact Assessment means that the economic vulnerabilities tied to tourism have not been thoroughly evaluated, contrary to the requirements set out in the Islands (Scotland) Act 2018. In a community with limited economic diversification, this oversight poses broader risks to employment, local businesses, and community sustainability. Furthermore, from a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4, especially regarding the necessity for a net economic benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector and fails to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Ultimately, the shortcomings in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and acknowledging the island's economic reliance culminate in a significant evidential gap. This gap hinders a thorough assessment of economic effects, leading to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm embodies a critical shortfall in fulfilling the principles of sustainable development as mandated by statutory duties and national policy. This application echoes the fundamental issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, it is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

The evidential basis provided in the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope persists. There is an overreliance on unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are overlooked. Consequently, the Environmental Impact Assessment remains unfinished, hindering a comprehensive understanding of significant effects and residual impacts.

Moreover, clear procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while failing to disclose a full Social Impact Assessment constitutes a serious omission. These failings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct contradiction to National Planning Framework 4, as it

does not demonstrate the necessary protection for biodiversity, natural spaces, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

In conclusion, the application is procedurally and substantively unsuitable for determination. The multitude of information gaps, in conjunction with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or activate the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

The harm that this windfarm will cause , because of the immense size of the turbines, and the proximity to the coast , is incalculable.
It is shocking that the Scottish government is allowing this.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6F72B5CA

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 application fails to provide an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while the unspecified mitigation measures mean their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly impact the statutory tests required for consent and undermine the capacity of the competent authority to determine that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, as large turbines are positioned in close proximity to the shoreline. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In such circumstances, the precautionary principle must apply. The proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the proposal raise fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness, transparency, and reliability regarding the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty hinders the consistent application of a worst-case

scenario and undermines the integrity of the assessment, leading to impacts presented that may not accurately represent the actual development. Consequently, this prevents both the public and the competent authority from understanding the true extent of the environmental effects.

Moreover, the application significantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. As a result, consent is sought with the expectation that any environmental harm will be rectified subsequently. This approach hampers any meaningful evaluation of the effectiveness of proposed measures or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly identified before determination.

There are also substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations, which necessitates the exclusion of 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 compliance with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This area represents a sensitive and biologically vibrant marine system, yet the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not establish a solid evidential foundation for evaluating impacts.

A significant shortcoming involves otters, a species afforded protection under European law, as the application inadequately acknowledges and assesses their active utilisation of coastal regions for foraging and movement. This oversight regarding their core foraging range and behaviour results in an insufficient evaluation of the potential effects stemming from construction disturbances, noise, and heightened activity. As a result, the conclusions regarding the absence of significant effects on this species are fundamentally undermined.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate a regular occurrence of these sharks in the waters concerned. The neglect to incorporate or adequately consider such data culminates in an incomplete baseline, further eroding the reliability of the conclusions drawn.

These methodological shortcomings indicate that the assertions of negligible or non-significant effects rely more on assumptions than on sound evidence. The lack of adequate baseline data also hinders a meaningful analysis of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This results in considerable uncertainty about the actual extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime as well as the National Planning Framework 4, due to the improper identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is not legally permissible to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction exists within the application, as the developer concludes that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only necessary when significant harm is expected, which raises doubts about the reliability of the assessment and indicates that the conclusions reached are not substantiated by the evidence provided. Furthermore, the assessment lacks sufficient evidence to assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not thoroughly considered, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are experiencing severe declines. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and the behavioural responses of the birds are not fully understood.

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

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

Moreover, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to 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 rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings inhibit a thorough evaluation of the 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 of the development's impact on cultural heritage and community identity is fundamentally flawed, as it overlooks the West Lewis coastline's significance as a living cultural landscape that interlinks environment, language, tradition, and community. By adopting a narrow perspective, the application treats heritage as a collection of isolated, static features instead of recognising their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming of the assessment is its inadequate treatment of culturally

significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they are mischaracterised as static features. This neglect of their ongoing use and significance leads to an incomplete understanding of cultural effects and dismisses their importance to community life.

Additionally, the assessment fails to account for intangible cultural heritage, such as the Gaelic language and the traditions that have fostered a deep connection between the community and the coastal environment. These vital components are essential to the area's identity yet are conspicuously absent from the assessment, highlighting a considerable oversight. Without recognising these elements, it is impossible to fully comprehend the cultural impact of the proposed development.

Concerns regarding community rights and engagement further complicate the situation. The Gaelic-speaking population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the lack of Free, Prior and Informed Consent processes undermines the assessment's validity. This failure to engage meaningfully with the community compromises the integrity of the evaluation and neglects established participatory principles concerning cultural and environmental matters.

Moreover, the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018, represents a critical procedural failure. This assessment is essential for the competent authority to meet its legal obligation to assess social, cultural, and economic impacts on the island community. Its omission alone precludes a lawful determination.

From a policy standpoint, these shortcomings directly conflict with the National Planning Framework 4, especially regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage and the failure to acknowledge living cultural practices constitute a significant deviation from established policy requirements.

In summary, the neglect of living heritage, intangible cultural values, community rights, and adherence to statutory obligations leads to a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a sufficient foundation for evaluating the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application fails to properly assess the impacts on seascape, landscape, and visual aspects, leading to significant deficiencies in understanding the extent of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. Large-scale turbines close to the shoreline would introduce a dominant industrial presence that would fundamentally change this character, resulting in a permanent and irreversible transformation of the landscape.

The visual changes that would arise from the installation of these turbines are not adequately represented in the application. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not sufficiently capture the significance of this impact within such a sensitive landscape.

Concerns also exist regarding the methods used to select and present visual viewpoints. Evidence indicates that the viewpoints may not encompass the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. As a result, the magnitude of the visual impact may be understated, which casts doubt on the reliability of the assessment.

Moreover, the application neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape linked visually and spatially to the Atlantic horizon. Treating these assets in isolation disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change proposed is not in alignment with the requirement to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resultant change is fundamental and permanent, with no possibility of reduction to an acceptable level through mitigation.

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

FISHERIES AND MARINE LIFE

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

A major concern lies in the assumption that fishing activities can be displaced without negative effects. The application fails to provide evidence that alternative fishing grounds are available or can support the added pressure from displaced fishing. This lack of information is crucial, as such displacement could lead to overfishing in other areas and negatively impact the local fishing fleet's economy. Without a thorough and evidence-based evaluation, the effects on fisheries and livelihoods remain unclear.

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal suffers from a significant deficiency in the assessment of onshore infrastructure, failing to account for the full scope of impacts associated with what

constitutes a single integrated project. The offshore turbines and the associated onshore works are closely interconnected; however, they have been evaluated separately, resulting in a disjointed approach that masks the true magnitude of environmental and socio-economic consequences.

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

By neglecting or postponing the evaluation of onshore impacts, the application undermines the potential for a proper examination of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively; nevertheless, the distinction between offshore and onshore elements obscures the comprehensive understanding of their combined effects on peatlands, habitats, and local communities.

There are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, highlighting a notable evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide proof that requisite consents or procedures have been initiated, raising doubts about the feasibility and lawful execution of the project.

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

In conclusion, the separation of project elements, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this application incomplete and untrustworthy, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would be visible over long distances,

creating a continuous and intrusive "wall of light" effect across the western horizon and fundamentally altering the night-time environment. The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the growing significance of dark skies to the local identity and emerging tourism sectors, such as astro-tourism.

Moreover, there is a critical absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The lack of a lighting impact assessment or phototaxis study means that there is no understanding of how the proposed aviation lighting could affect these species or increase mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or the associated risks. For example, species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data creates a critical gap in comprehending ecological impacts.

Without assessing the nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to demonstrate no adverse effects beyond reasonable scientific doubt cannot be met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, the omission conflicts with the National Planning Framework 4, which pertains to the protection of natural places and the preservation of environmental quality. This oversight further undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral part of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under an ostensibly stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still falls

short.

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

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

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

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

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

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

Additional Comments

I strongly object to the offshore wind farm for many reasons, some including the environmental impact the construction of the turbines will have, as well as the impact they will have of seabirds and marine life once in situ.

I also have great concerns about the visual impact it will have on what is a unique landscape and of great cultural importance and its vulnerability.

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: BA70C562

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting material deficiencies across planning, environmental, cultural, and procedural aspects. 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. Concerns regarding the scale, proximity, and design of the proposal directly challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful determination. There are significant gaps in critical environmental data, with baseline information proving to be limited and inconsistent. Furthermore, key components of the proposal are not clearly defined. The reliance on a flexible design framework undermines a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot currently be evaluated. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts involved, with claims of negligible or non-significant effects lacking robust evidence.

Additionally, the proposal reveals clear and substantive conflicts with policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent overview of the expected environmental effects of the proposed project. The employment of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and hinders the application of a worst-case scenario analysis. This deficiency compromises the assessment's integrity, resulting in a lack of clarity for both the public and the competent authority regarding the actual environmental impacts that may arise from the development.

Furthermore, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under such circumstances implies that environmental harm will be rectified post-approval, thus obstructing any substantive evaluation of the efficacy of these measures or the assessment of residual impacts. This postponement of essential information to a later stage not only contravenes the procedural norms but also undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be adequately detailed before a decision is made.

There are also critical evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are presented without strong supporting data. The lack of adequate information results in an unclear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects with reasonable scientific certainty. This invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been thoroughly assessed or that suitable safeguards are in place regarding biodiversity protection and environmental integrity.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally inadequate, lacking a comprehensive and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This area is a biologically

active marine system, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture crucial information regarding species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Significant omissions are evident, particularly concerning otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their utilisation of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential implications of construction disturbance, noise, and increased human activity remain inadequately evaluated. This oversight undermines any claims regarding the absence of significant effects on this species.

Further issues are present in the assessment of basking sharks, where an overreliance on aerial surveys leads to considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to appropriately incorporate or consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally unreliable ornithological assessment, marked by significant gaps in evidence and contradictions that call its conclusions into question. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, already in decline, reside. Despite this, the assessment fails to demonstrate convincingly that

these species will not suffer adverse effects. The implications of displacement, collision risk, or habitat loss have not been adequately evaluated.

There is a crucial inconsistency within the application itself. While the developer concludes that there are no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which only arises when significant harm is anticipated. This contradiction further undermines the reliability of the assessment and indicates that the conclusions drawn lack support from the underlying evidence.

Moreover, the assessment does not adequately substantiate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully considered, and the reliance on modelling methodologies introduces substantial uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. It is likely that mortality rates are underestimated due to incomplete baseline data and an insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term effects of sustained mortality within this corridor are not adequately assessed, raising concerns for species with relatively small global populations.

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

Additionally, the identified deficiencies contravene 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 creates a direct conflict with national policy.

In summary, the assessment is rendered unreliable by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies hinder a robust evaluation of potential impacts and support the conclusion that the application fails to meet the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that undermines the integrity of the evaluation process. While the developer has engaged in the collection of data through focus groups with local residents, the failure to publish the full report creates a significant evidential gap. This gap inhibits both public understanding and the competent authority's ability to fully assess the

social risks identified through the developer's own research.

Evidence suggests that residents are currently facing measurable stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. However, the absence of the complete assessment restricts proper scrutiny of the findings, thereby limiting the capability to evaluate their significance in the decision-making framework.

Furthermore, there is substantial indication that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings highlighting a risk of “cultural loss.” Despite the recognition of these impacts, they have not been adequately incorporated into the main application nor given the necessary weight in the evaluation process. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The implications of this lack of transparency are far-reaching, as it undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The failure to provide the full dataset means that the application lacks a comprehensive evidential basis needed to assess the balance between benefits and harm effectively.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. The development is required to support positive health outcomes and mitigate harm, yet the available evidence reveals existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this essential policy cannot be established.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential standards outlined in the Environmental Impact Assessment regime.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is significantly lacking and does not include the necessary details to adequately evaluate potential environmental impacts. There is a proposed undertaking of substantial seabed preparation and installation work in a high-energy Atlantic environment; however, the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be

established after consent has been granted, which hampers any meaningful assessment of their potential effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the environment it affects. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to sediment disruption and pollution. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not supply adequate information on how these risks will be prevented, managed, or monitored.

Moreover, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential repercussions for marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant likely effects and mitigation measures must be evaluated before consent is granted, and in the absence of such information, a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to account for the interconnected nature of the offshore turbines and onshore works. These elements should be evaluated as a cohesive unit, as their separation obscures the true magnitude of their environmental and socio-economic impacts. The onshore works involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such activities include excavation in areas of deep peat, particularly within Barvas Moor, which is

crucial both as a significant carbon store and as an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's overall environmental footprint.

Additionally, by deferring or omitting the assessment of onshore impacts, the application undermines the capacity to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all project components be considered in conjunction, yet the current approach leads to a lack of understanding of the combined effects on peatlands, habitats, and local communities. The risks posed to sensitive habitats such as machair systems and peatland environments, which are protected by policy, remain unaddressed in the application. It does not convincingly demonstrate that thorough assessments of these habitats have been conducted or that suitable avoidance measures have been considered, revealing a significant evidential gap regarding biodiversity protection.

There are also serious concerns about carbon balance stemming from this proposal. The disturbance of peatland can release carbon that has been stored, potentially incurring a carbon debt that contradicts the fundamental goals of renewable energy initiatives. The application falls short in addressing this critical issue, failing to show that the overall carbon balance is indeed favourable.

Moreover, the routing of infrastructure through active croft land raises conflicts with existing land use and legal rights. The application provides insufficient evidence that requisite consents or processes have been initiated, which casts doubt on the project's deliverability and lawful execution.

From a policy standpoint, the lack of a holistic assessment and the failure to ensure the protection of peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated significantly undermines the application. Overall, the disjointed treatment of project components, the absence of a comprehensive evaluation, and the insufficient evidence regarding environmental and land use impacts result in an application that is incomplete and unreliable, thus impeding a lawful determination.

TOURISM

The assessment of tourism impacts is notably inadequate and does not sufficiently evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While 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 overall economic contributions.

Tourism has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the

island's economy. Nonetheless, the application does not model the potential impacts of seascape industrialisation and environmental quality loss on Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains unclear whether the development would yield a net economic benefit or potentially harm a well-established and expanding sector.

The assessment neglects to address the role of environmental quality in enhancing tourism, particularly the importance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a considerable gap in understanding the impacts on a recognised and growing aspect of the local economy.

In light of an island community with limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly assessed, as required under the Islands (Scotland) Act 2018.

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

Ultimately, the lack of quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency result in a significant evidential gap. This inadequacy prevents a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development, as it does not align with statutory duties, national policy, or evidential standards. It mirrors the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This new application comes under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

elucidate the likely significant effects or residual impacts.

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

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

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

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

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

Additional Comments

Although I am generally in favour of more eco friendly ways to generate power, I don't think this is the right way to go about it. This would be a massive construction project, causing damage to sea life, birds, the sea bed as well as being a huge blot on the landscape. It'll change the way of life on the island, causing disruption and noise and although I believe there may be some local employment, I understand that most will be contractors brought in.

The islands will not benefit from cheaper electricity - the only winners will be a foreign owned company, who will be destroying our unique environment, and the rest of the UK who will be getting their electricity cheaper.

It'll cause extra strain on existing island services, and will likely affect tourism as well - who would want to come and see a massive construction site and listen to the noise when people come here for the beautiful scenery, beaches and peace and quiet. Please don't let this destruction go ahead.

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: 2DBBC32C

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 regulations. The objection arises from an analysis of the Environmental Impact Assessment Report and accompanying documentation, highlighting several significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural issues. Situated off the west coast of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles, particularly given its scale, proximity to the shore, and design.

The application lacks a solid evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many key aspects of the proposal are left undefined. The application's flexible design framework inhibits a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed view of the potential environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and substantial. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly impact the statutory tests necessary for consent and hinder the competent authority's ability to deem the development acceptable under policy terms.

The unprecedented scale of this proposal raises additional issues, as large turbines are planned to be positioned in close proximity to the shoreline, introducing serious concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

ASSESSMENT OF ALTERNATIVES

The application does not sufficiently address the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It provides a narrative account of the project's evolution rather than a structured comparison of realistic alternatives based on their environmental effects. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. The failure to consider the placement of turbines further offshore, where visual, ecological, and coastal impacts might be reduced, is particularly concerning. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impacts, and without this analysis, it cannot be concluded that the proposed siting is the least damaging option available.

The inadequacies also extend to the assessments of cable routing and landfall, with insufficient evidence that alternative routes have been properly investigated to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas, such as Barvas Cemetery. The lack of a clear avoidance strategy coupled with the absence of comparative analysis suggests that the application does not apply mitigation by design but relies instead on post-design measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This constitutes a breach of the established mitigation hierarchy, limiting the competent authority's ability to determine whether less harmful and more appropriate alternatives are available. The absence of a thorough alternatives assessment precludes any conclusion that the proposal is a sustainable or compliant solution with existing policies.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant shortcoming that contributes to the conclusion that the application has not been adequately evaluated, thus preventing a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly lacking, failing to provide a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically active marine system, yet the existing baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not establish a solid evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, classified as a European Protected

Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential effects of disturbances from construction, noise, and increased human activity have not been sufficiently evaluated. This significant oversight undermines the conclusions regarding the absence of adverse effects on this species.

In addition, the assessment of basking sharks demonstrates further deficiencies. The reliance on aerial surveys introduces a substantial detection bias, especially under Atlantic conditions. This methodology is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such observations leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that conclusions about negligible or non-significant effects rest on assumptions rather than robust evidence. Moreover, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty surrounding the actual scale of risk posed to marine species and their habitats.

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

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

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

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

These deficiencies also represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy. Collectively, the assessment is deemed unreliable due to methodological weaknesses, internal inconsistency, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not meet the statutory requirements necessary for support.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally flawed, as it does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are interconnected. The approach taken in the application reduces heritage to mere isolated assets, neglecting their ongoing cultural, spiritual, and social significance within the community.

A major shortcoming is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are classified as static features in the assessment. This mischaracterisation fails to account for their continued use, the significance they hold, and the implications of development on their surroundings. Consequently, this results in an incomplete understanding of the cultural effects and ignores their importance to community life.

Moreover, the application overlooks intangible cultural heritage elements, including the

Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These factors are integral to the area's identity, yet they are completely absent from the assessment, creating a significant gap. Without these considerations, the cultural impact of the proposed development cannot be accurately gauged.

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

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to address both tangible and intangible heritage and to acknowledge living cultural practices represents a significant departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report remains unpublished. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified by the developer's own research. Summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, making them concrete rather than speculative. Nevertheless, the failure to disclose the entire assessment limits scrutiny of the findings and affects their significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Unfortunately, these impacts have not been adequately integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact

Assessment obscures the actual human and social costs of the development.

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

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid causing harm, yet the available evidence indicates that there are existing adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be assured.

The procedural ramifications are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material shortcoming within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines near the West Lewis coastline presents significant shortcomings in the assessment of seascape, landscape, and visual impacts. This coastline, characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness, would face fundamental alterations due to the introduction of an industrial presence in close proximity to the shoreline. Such a transformation is not only significant but also permanent and irreversible, fundamentally changing the landscape character.

The application inadequately portrays the extent of visual change, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and compromise the essential qualities of naturalness and remoteness that define the area. The current assessment fails to capture the severity of this impact or its importance within the context of such a sensitive landscape.

Methodological issues are also evident in the selection and presentation of visual viewpoints. It appears that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and areas of high landscape value. This raises concerns that the

assessment may have understated the magnitude of visual impacts, thereby questioning the reliability of the findings.

Moreover, the assessment does not consider the interconnected nature of landscape, seascape, and cultural heritage. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are embedded within a broader landscape context that relies on visual and spatial links to the Atlantic horizon. By treating these assets as separate entities, the assessment overlooks their interdependence, leading to an incomplete analysis of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship with the natural horizon. This results not only in a visual impact but also in broader cultural and spatial harm, which the application has not sufficiently evaluated.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of the proposed changes is inconsistent with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes any claims of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. As such, the anticipated changes represent a fundamental and permanent alteration that cannot be lessened to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail to evaluate the likely environmental effects, as it does not provide a complete assessment of construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that will be developed post-consent. This approach is particularly troubling due to the sensitivity of the receiving environment, which includes the West Lewis coastline that supports clean coastal waters and important habitats vulnerable to sediment disturbance and contamination.

The risks acknowledged in the application, such as sediment mobilisation and accidental chemical or oil spills, are not accompanied by adequate preventative or control measures. The scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation remain uncertain, and without robust modelling and

defined management strategies, the ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

Compounding these issues is the absence of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage hinders any evaluation of whether appropriate safeguards are in place to manage pollution events. Such a process introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

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

Overall, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and strengthen the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

There is also a notable inconsistency within the application itself, where the necessity

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

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

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

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

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.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are important for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This would significantly change the night-time environment.

The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Dark skies are crucial to the area's identity and to emerging sectors like astro-tourism. This oversight leads to a notable gap in the landscape and environmental assessment.

Moreover, the application does not evaluate the effects of artificial lighting on nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to such lighting, which can cause disorientation and increase collision risks. There is no lighting impact assessment or phototaxis study included, which means the potential effects on these species and their mortality rates are not addressed.

The situation is worsened by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this has also not been assessed. The lack of specific night-time data leads to a significant understanding gap regarding ecological impacts.

Without proper assessment of nocturnal effects, it is impossible to determine if protected species or designated sites would be adversely affected. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not

met, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4, which aims to protect natural places and ensure environmental quality. It also weakens the overall evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife presents 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 represents a significant failure to meet the criteria of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This latest application is now presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided by the application is neither complete nor reliable. There are notable deficiencies in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Additionally, the application overlooks crucial impact pathways, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of potential significant effects and residual impacts.

Furthermore, there are distinct procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018. The omission of a comprehensive Social Impact Assessment further compounds these issues, obstructing the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience. These inadequacies are enough to deem the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has not been conducted properly, which obscures understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant as well. The

evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

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

In light of these numerous and serious concerns, the application is both procedurally and substantively unfit for determination. The scale of information gaps, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the appropriate regulatory measures to compel the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 00B3CCFC

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 marine licensing and the Environmental Impact Assessment regimes. The objection arises from an evaluation of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west coast of the Isle of Lewis, an area noted for its Atlantic-facing shoreline, relatively untouched environment, and robust cultural heritage. Concerns are raised about the scale, proximity, and design of the project in relation to statutory obligations, national policies, and sustainable development principles.

The application is deficient in providing a sufficient evidential basis for a legal determination. There are substantial gaps in critical environmental data, with baseline information appearing limited and inconsistent. Many essential aspects of the proposal remain inadequately defined. The application employs a flexible design framework, which obscures the understanding of potential significant effects. Furthermore, it relies on unspecified mitigation measures, rendering any assessment of their effectiveness impossible. Consequently, the documentation fails to deliver a comprehensive understanding of environmental, cultural, or community impacts, while assertions of negligible or non-significant effects lack robust substantiation.

There are evident and significant conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It does not sufficiently demonstrate compliance with national mandates aimed at protecting biodiversity, climate considerations, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and challenge the ability of the competent authority to deem the development acceptable from a policy standpoint.

The magnitude of the proposal is unprecedented in this area, with large turbines sited in close proximity to the coastline, raising serious issues regarding landscape capacity, visual prominence, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the application must be approached with the precautionary principle in mind.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and does not deliver a comprehensive, transparent, or dependable evaluation of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, which compromises the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that will ultimately be constructed, leaving both the public and the competent authority unable to grasp the true extent of the environmental consequences.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Consequently, consent is sought on the premise that any environmental harm will be addressed at a later date. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

There are also substantial evidential shortcomings, which include gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions asserting negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential standards required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes obligations related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority without the necessary information to make an informed determination on the application.

ASSESSMENT OF ALTERNATIVES

The lack of a comprehensive assessment of alternatives significantly undermines the application, failing to meet the statutory requirements of the Environmental Impact Assessment regime. The submission does not provide a reasoned, structured

comparison of realistic alternatives based on their environmental implications. Instead, it offers a narrative that reflects the project's evolution but does not substantiate that less harmful options have been identified and chosen over more damaging alternatives.

There is no clear, evidence-based analysis of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has thoroughly considered positioning turbines further offshore, which could likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in determining impact, means that the absence of this analysis inhibits any conclusion regarding whether the proposed siting is indeed the least damaging option.

These inadequacies extend to the assessment of cable routing and landfall, where the evidence presented falls short in demonstrating that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been implemented, resulting in a reliance on post-design mitigation measures.

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

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured, comparative assessment constitutes a significant omission, contributing to the overall conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to deliver a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet the data gathered is incomplete and the methods used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, there is a significant oversight concerning otters, which are a European Protected Species. The application does not adequately acknowledge or evaluate their use of coastal regions for foraging and movement. This oversight of their core foraging range and behavioural patterns results in an insufficient assessment of how

construction disturbance, noise, and increased activity could potentially affect them. Such deficiencies undermine any claims regarding the lack of significant effects on this species.

The assessment of basking sharks also shows significant flaws. The reliance on aerial surveys creates a notable detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate these waters are frequently used by basking sharks. By not incorporating or properly considering this data, the assessment presents an incomplete baseline and diminishes the reliability of its conclusions.

The methodological shortcomings mean that claims of negligible or non-significant effects are based on assumptions rather than on strong evidence. The lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

Regulatory requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4 are not met by the application, 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, thus invoking the precautionary principle. Therefore, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided in the application is flawed, presenting significant gaps in evidence and internal contradictions that seriously undermine its conclusions. Key foraging areas and migratory pathways for seabird populations are located on the west coast of the Isle of Lewis, which is home to internationally important species that are already in decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse effects due to the proposed development. Critical issues such as displacement, collision risk, and habitat loss are not thoroughly evaluated within the assessment.

A notable inconsistency arises in the application, as the developer asserts that there will be no significant adverse effects while concurrently putting forth a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction raises concerns about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the available evidence.

Moreover, the assessment does not sufficiently establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully considered, and the dependence on modelling approaches brings added uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The proposed turbine locations are situated within a recognised migratory corridor, which introduces a significant risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to assess the long-term implications of sustained mortality within this corridor, as well as the potential impact on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with data deficiencies and limitations in the modelling approach, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies represent a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not suffer adverse effects places the proposal in direct conflict with national policy.

Overall, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. The intrinsic connections between environment, language, tradition, and community are overlooked, leading to a reductionist portrayal of heritage as a collection of isolated, static assets. This approach fails to acknowledge the ongoing social, cultural, and spiritual functions that these elements serve within the community.

The assessment inadequately treats culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial grounds and places of spiritual significance, yet they are mischaracterised as static features devoid of their continued relevance and the potential impacts of development on their surroundings. This lack of understanding leads to an incomplete evaluation of cultural effects and ignores the cemeteries' vital role in community life.

Intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment, is also neglected in the assessment. These aspects are central to the identity of the area, yet their omission signifies a serious gap in understanding the cultural ramifications of the proposed development.

Moreover, there are significant issues regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity akin to that of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. This lack of meaningful engagement raises serious concerns about the legitimacy of the assessment and fails to adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A critical procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is essential for the competent authority to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. The absence of this assessment alone renders the determination unlawful.

From a policy standpoint, the application's deficiencies stand in stark contrast to National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, signifies a blatant departure from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminate in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not provide a reliable foundation for understanding the true cultural costs associated with it.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that includes focus groups with local residents; however, the full report has not been published. This represents a significant evidential gap, which hinders both public understanding and the competent authority's ability to assess the full extent of the social risks identified through the developer's research. Available summaries suggest that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, highlighting the immediate social impacts that have emerged from direct community engagement.

Furthermore, there is a notable perception among residents that the proposal threatens community identity and cohesion, with evidence of "cultural loss" identified in the developer's findings. Unfortunately, these findings have not been adequately integrated into the main application or given the appropriate consideration. The decision to withhold the full Social Impact Assessment obscures the true human and social costs

associated with the development, which is essential for informed decision-making.

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, particularly when the character and functioning of the community may be at stake. Without the complete dataset, the application fails to provide a thorough evidential basis for assessing the balance between potential benefits and the associated harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm; however, the evidence available indicates the presence of existing adverse effects that have not been fully disclosed. Thus, without the complete assessment, it cannot be established that the application meets this policy requirement.

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment, which constitutes a material omission within the application and a failure to meet the evidential standards of the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, coupled with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This ultimately prevents a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly inadequate, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish a continuous industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape.

Moreover, the application does not adequately illustrate the extent of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment fails to effectively communicate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the choice and presentation of visual viewpoints. There is evidence to suggest that these viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact

has been understated, casting doubt on the reliability of the overall assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are intricately linked to the surrounding landscape and the Atlantic horizon. The evaluation treats these sites as isolated entities, overlooking their interdependence and resulting in an incomplete assessment of their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and disconnecting them from their natural context. This not only presents a visual impact but also signifies broader cultural and spatial harm, which has not been adequately addressed in the application.

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

The identified impacts are inherently unmitigable. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the change to the landscape is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail for evaluating environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be established after consent, thereby hindering any meaningful evaluation of their adequacy or effectiveness.

The reliance on unspecified future measures is alarming in light of the sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and vital habitats, which are particularly susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it falls short of providing adequate

details on prevention, control, or monitoring strategies.

Moreover, there remains significant uncertainty about the scale and behaviour of sediment plumes generated from seabed disturbance and cable installation. In the absence of rigorous modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been recognised as sensitive in broader assessments.

Further exacerbating these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs an assessment of whether effective safeguards will be in place to address pollution incidents. This not only introduces procedural risk but also weakens the competent authority's ability to appraise environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements set out in the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies be evaluated prior to consent; without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant concerns regarding the incomplete assessment of onshore infrastructure and its associated impacts, which are crucial for understanding the entirety of this integrated project. The offshore turbines and the onshore works are inherently connected, yet the current evaluation treats them as separate entities. This fragmented assessment obscures the true extent of environmental and socio-economic effects.

Onshore works encompass cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is ecologically sensitive and serves as a significant carbon store. The lack of a comprehensive assessment of these impacts fails to provide a full understanding of the project's overall environmental footprint.

The application's decision to exclude or defer the assessment of onshore impacts inhibits a thorough evaluation of cumulative effects. The Environmental Impact

Assessment process stipulates that all project components must be examined collectively. However, the disjointed consideration of offshore and onshore aspects means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Additionally, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these habitats have been comprehensively evaluated, nor does it outline appropriate avoidance measures, leading to significant gaps in biodiversity protection.

Concerns are also raised regarding carbon balance due to the disturbance of peatland, which releases stored carbon and potentially incurs a carbon debt. This situation stands in opposition to the goals of renewable energy development. The application fails to address this matter adequately, nor does it show that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is no evidence that the requisite consents or processes have been initiated, raising doubts about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project holistically, alongside the inability to demonstrate protection for peatlands, habitats, and land use interests, contradicts the National Marine Plan and National Planning Framework 4. The lack of evidence regarding the avoidance or mitigation of impacts further undermines the application.

In summary, the disconnection of project components, the absence of a thorough assessment, and insufficient evidence related to environmental and land use impacts render this section of the application incomplete and unreliable, ultimately hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is notable for its exceptionally dark skies, which play a crucial role in the environmental quality, cultural identity, and tourism value of the area. However, the proposal introduces permanent red aviation lighting that would be visible over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the area's identity and the emerging sector of astro-tourism, this omission is particularly concerning and highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application does not evaluate the effects of artificial lighting on nocturnal

wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are vulnerable to disorientation caused by phototaxis, which can increase their risk of collision. The absence of any lighting impact assessment or phototaxis study means that the proposal neglects to consider how aviation lighting might affect these species or contribute to increased mortality rates.

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

Without an assessment of nocturnal impacts, it becomes 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, engaging the precautionary principle and hindering a lawful determination.

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

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife constitutes a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unable to support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria of sustainable development, as it does not align with statutory duties, national policy, or evidential standards. This application echoes the primary concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is presented now under a policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet fails to address these critical areas effectively.

Significant gaps exist in the evidential basis necessary for informed determination. The application lacks comprehensive baseline data and continues to utilise an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and neglects to address key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

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

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

Environmental risks associated with the proposal are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals remain incomplete and, in certain areas, inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

This 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 tourism impacts represent permanent changes that cannot be mitigated to an acceptable degree.

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

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

Additional Comments

Another generation of islanders sold out to the highest bidder. They will write about this in the annals of history along with the Highland clearances. Bought and sold for foreign gold. Disrespectful and disgraceful. The people and the natural significance of this place being disregarded. Shameful

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: 72421A2B

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. The objection is grounded in an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The proposal's scale, design, and proximity to the shoreline raise critical concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not underpinned by robust evidence.

There are notable and substantial conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests necessary for consent, thereby undermining the competent authority's ability to conclude that the development meets acceptable policy standards.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual impact, and environmental repercussions. With large turbines situated close to the shoreline, the application's deficiencies—including insufficient information, reliance on undefined mitigation strategies, and evident policy non-compliance—render it incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or dependable assessment of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the consistent application of a worst-case scenario. This compromises the integrity of the assessment, leaving both the public and the competent authority without a clear understanding of the true extent of environmental effects related to the proposed development.

Furthermore, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be mitigated later undermines any thorough evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contravenes the objective of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation must be clearly established before any determination.

Additionally, there are notable evidential shortcomings, such as insufficient baseline data, methodological constraints, and a tendency to depend on assumptions instead of site-specific evidence. This yields uncertainty about the scale and significance of impacts, especially in instances where conclusions of negligible or non-significant effects are made without strong supporting data. The lack of adequate information hinders a proper understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot satisfy statutory obligations.

As a result, the application does not fulfil the evidential threshold outlined in the Habitats Regulations, which is essential to exclude adverse effects beyond reasonable scientific doubt. This raises the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to adhere to National Planning Framework 4, including the mandates pertaining to biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that suitable safeguards are established.

Collectively, the dependence on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The application proposes a project but fails to provide a proper assessment of alternatives, which does not meet the requirements set by the Environmental Impact Assessment regime. It does not offer a structured comparison of realistic alternatives based on their environmental effects. Instead, it presents a narrative of how the project has evolved. This approach does not show that less harmful options have been

adequately identified, assessed, and chosen over more damaging solutions.

There is a lack of transparent comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not prove that the developer has truly considered placing turbines further offshore, where the potential for visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline and the critical role of proximity to shore in impact assessment, the absence of such analysis prevents any determination that the proposed siting is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, revealing inadequate evidence that alternative routes have been properly investigated to avoid or reduce impacts on sensitive areas, including those of cultural and spiritual significance like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation through design has not been applied. Instead, there seems to be an over-reliance on mitigation measures that occur after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful selection of the site, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to assess whether less harmful and more suitable alternatives exist. Without a thorough assessment of alternatives, it cannot be determined that the proposal is a sustainable or compliant solution with relevant policies.

From a policy standpoint, this lack of assessment undermines compliance with National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and the wellbeing of communities. The failure to provide a structured and comparative assessment is a significant omission that contributes to the conclusion that the application has not been adequately evaluated, thereby failing to support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, failing to deliver a complete or dependable understanding of the ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, there is no solid evidential basis for evaluating potential impacts.

Particularly concerning is the inadequate treatment of otters, a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to a failure in adequately assessing the potential

effects of construction disturbance, noise, and increased activity. Such omissions undermine any conclusions that suggest there are no significant effects on this species.

The assessment of basking sharks also presents further shortcomings, as it relies heavily on aerial surveys that introduce notable detection bias, particularly in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to properly consider or incorporate such data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological flaws imply that conclusions of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This gap creates uncertainty about 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 the identification and assessment of protected species have not been conducted properly. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be legally granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These shortcomings impede a thorough evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, with substantial gaps in evidence and inconsistencies that call into question its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not meet the necessary evidential standard to demonstrate that these species will remain unharmed. Key foraging areas and migratory pathways are located within the development site, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself, as the developer concludes there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment, suggesting that its conclusions lack adequate support from the evidence provided. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to

protected sites, including the Lewis Peatlands and St Kilda, will not be affected. The vital importance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling approaches introduces a degree of uncertainty, especially for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate potential mortality, particularly when baseline data is lacking and behavioural responses remain inadequately understood.

The siting of turbines within a designated migratory corridor creates an additional risk, posing a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not properly assess the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development has not adequately assessed the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape, where environment, language, tradition, and community are interconnected. The application employs a reductive perspective, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A significant flaw in the assessment concerns culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice. However, the assessment erroneously categorises them as static features, overlooking their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and fails to acknowledge their importance within community life.

Additionally, the application neglects to evaluate intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, representing a significant oversight. Without addressing these elements, a thorough understanding of the cultural impact of the development is unachievable.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity that aligns with recognised characteristics of an Indigenous People. Nevertheless, the process of Free, Prior and Informed Consent has not been conducted. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural error is the absence of a compliant Island Communities Impact Assessment, a statutory requirement established by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfill its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders a lawful determination.

From a policy standpoint, these shortcomings place the proposal in direct 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, as well as to recognise living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is deeply concerning and raises significant issues regarding health and wellbeing in our community. Although the developer engaged local residents through focus groups, the full report remains unpublished, creating a substantial evidential gap. This omission hinders both public understanding and the competent authority's ability to gauge the full extent of social risks identified in the developer's own research.

Available summaries reveal that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These documented impacts stem from direct engagement with the community and are therefore not mere speculation. However, the failure to disclose the complete assessment inhibits thorough scrutiny of the findings and obstructs the determination

of their significance within the decision-making process.

Furthermore, there is clear evidence that the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” specifically highlighted in the developer’s findings. Despite this recognition, such impacts have not been adequately integrated into the application or given the weight they deserve. By withholding the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency also compromises the integrity of the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality are at risk. The absence of complete data prevents a comprehensive evidential basis for assessing the balance between potential benefits and harm.

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

The procedural ramifications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the lack of access to the full Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of pre-existing adverse impacts, leaves the evaluation incomplete and unreliable. This situation ultimately obstructs a lawful determination and underscores the inadequacy of information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not adequately convey the magnitude of the visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. Methodological concerns arise

regarding the selection and presentation of visual viewpoints, which may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, diminishing the assessment's reliability.

Another significant oversight is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been sufficiently assessed. From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of policy compliance.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation. Collectively, these deficiencies in the assessment fail to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and important habitats that are particularly sensitive to sediment disturbance and contamination. The application acknowledges the presence of risks such as sediment mobilisation and accidental chemical or oil spills; however, it lacks sufficient detail on preventative, control, or monitoring measures for these risks. The assessment of construction and pollution risks associated with the proposal is incomplete, failing to provide the necessary detail to evaluate the likely environmental effects adequately.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that will be formulated post-consent, which undermines any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures raises significant concerns given the sensitivity of the receiving environment.

Furthermore, 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, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the ability to evaluate whether appropriate safeguards are in place to address pollution events. Such a deferral introduces procedural risk and undermines the capability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the failure to provide critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed before consent is granted; without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts renders the assessment materially deficient. These shortcomings significantly hinder a robust evaluation of construction and pollution risks and further support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life associated with this application presents notable deficiencies that fail to provide a comprehensive understanding of ecological and socio-economic impacts. The waters off the West Lewis coast are known to support a diverse marine ecosystem alongside a thriving fishing industry; however, the proposal lacks adequate evidence to demonstrate that these uses and habitats can be preserved or maintained without significant disruption.

A fundamental concern is the presumption that fishing activities can be displaced without adverse consequences. The application does not substantiate claims that alternative fishing grounds are readily available, accessible, or capable of accommodating additional fishing pressure. This critical gap in the assessment is particularly significant, as displacement could lead to overfishing in alternative areas, thereby imposing broader economic ramifications on the local fishing fleet. Consequently, without a clear, evidence-based analysis, the implications for fisheries and livelihoods remain inadequately understood.

Moreover, the proposal introduces considerable risks to marine species, predominantly due to underwater noise produced during construction activities. The anticipated high-

energy hammer piling over a prolonged duration poses the risk of widespread disturbance, potentially impacting species such as dolphins. The projected disruption to a substantial segment of the local bottlenose dolphin population raises serious concerns, yet the application tends to downplay the gravity of these effects without sufficient corroborating evidence.

Furthermore, there exists a notable inconsistency within the application, wherein the necessity for licences to permit harm to European Protected Species is acknowledged. Simultaneously, the application characterises these impacts as negligible. This contradiction undermines the assessment's credibility and raises significant questions regarding compliance with the Habitats Regulations, particularly in cases where anticipated harm necessitates legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activity. In the absence of a thorough evaluation of these combined effects, it remains impossible to determine the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not convincingly demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, which hinders any conclusion regarding the proposal's alignment with sustainable development principles.

In summary, the deficiencies concerning evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies culminate in an assessment that is both incomplete and unreliable. These shortcomings obstruct a rigorous evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

By excluding or deferring the assessment of onshore impacts, the application fails to

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

The West Lewis coastline, known for its exceptionally dark skies, plays a vital role in the area's environmental quality, cultural identity, and tourism potential. However, the proposal introduces permanent red aviation lighting, which would be visible over vast distances, creating a continuous "wall of light" that would drastically change the night-

time landscape. The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been assessed, despite the significance of dark skies to the region's identity and the burgeoning astro-tourism sector.

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

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

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

TOURISM

The assessment of the potential impacts on tourism is significantly inadequate and neglects to examine the economic and social ramifications for a crucial sector of the economy on the Isle of Lewis. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting as much as 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and the resultant decline in environmental quality would affect Tourism Gross Value Added or the overall resilience of the economy. In the absence of this analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the assessment overlooks the significance of environmental quality in bolstering tourism, particularly the role of unspoiled landscapes and dark skies in shaping the visitor experience and fostering emerging markets like nature-based

tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial void in understanding the impacts on this recognised and expanding aspect of the local economy.

In a context where the island community has limited economic diversification, the failure to evaluate impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been considered as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the necessity to provide evidence of net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to furnish sufficient evidence for the competent authority to assess the economic implications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that influence visitor behaviour, and considering the island's economic dependence create a significant evidential gap. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious failure to meet the principles of sustainable development, as it falls short against statutory duties, national policies, and the required evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, as it presents a scale of industrialisation deemed unacceptable at that time. Despite being submitted under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not address these critical concerns.

Crucial gaps exist within the evidential basis necessary for determination. The application lacks comprehensive baseline data, employs an undefined design envelope, relies on unspecified mitigation measures, and omits key impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is insufficient, failing to allow for a thorough understanding of likely significant effects or residual impacts.

Additionally, significant procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties outlined in the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from fully evaluating 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. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and does not provide evidence of net economic benefits due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Moreover, the proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative effects on tourism present permanent impacts that cannot be mitigated to an acceptable degree.

In conclusion, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes the necessary regulatory provisions to compel the submission of the outstanding information.

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

Additional Comments

I object strongly to the Spiorad Na Mara windfarm on the issue that it will decimate slow flying and migrating birds. Particularly, Swans (Protected Whooper Swans), Geese, all migrating to the UK from Iceland. Also, Golden Eagles, White Tailed Eagles particularly at the proposed Northland/ESB, Spiorad Na Mara (N4) massive windfarm site that is only 3 miles from the Isle of Lewis west coast,

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: C60289F8

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by an examination of the Environmental Impact Assessment Report and its associated documents, revealing material deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposal, along with its proximity to the shoreline, raise significant concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Furthermore, essential components of the proposal remain undefined. The adoption of a flexible design framework hampers a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust support.

Substantial conflicts with established policy are evident. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not convincingly demonstrate that it can meet national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are fundamental to the statutory tests for consent and hinder the competent authority's capacity to deem the development acceptable within the policy framework.

The unprecedented scale of the proposal in this area, with large turbines located in close proximity to the shoreline, raises serious concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the shortcomings of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposal under consideration lacks a comprehensive assessment of marine ecology and protected species, which is essential for understanding the ecological receptors within the West Lewis coastal environment. This region is recognised as a highly sensitive and biologically active marine system. However, the data available is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of various species. Consequently, the assessment does not provide a reliable evidential basis for evaluating potential impacts.

Notably, the assessment fails to properly identify and assess otters, which are a European Protected Species. There is insufficient recognition of their active use of coastal areas for foraging and movement, and the core foraging range and behavioural patterns of otters have not been adequately considered. This lack of detail means that the potential impacts of construction disturbance, noise, and increased activity on otters have not been thoroughly assessed, undermining any conclusions about the absence of significant effects on this species.

Additionally, there are substantial deficiencies in the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and weakens the reliability of the conclusions drawn.

The methodological limitations present mean that conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been a failure to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the conclusion that adverse effects can be excluded beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development exhibits significant deficiencies, undermining its reliability and the conclusions drawn from it. A crucial aspect of the application is the presence of contradictory findings, particularly where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. This latter case is only warranted in situations where substantial harm is anticipated, which casts doubt on the reliability of the assessment and suggests a disconnect between the conclusions and the available evidence.

The assessment fails to adequately demonstrate that seabird populations associated with critical protected sites, such as the Lewis Peatlands and St Kilda, will not face adverse impacts. There is insufficient consideration given to the significance of key feeding grounds, and the reliance on modelling approaches introduces a level of uncertainty that is particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies utilised may also lead to an underestimation of mortality rates, especially given the gaps in baseline data and the incomplete understanding of species' behavioural responses.

Furthermore, the placement of turbines within a recognised migratory corridor adds another layer of risk, as it effectively acts as a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment does not sufficiently consider the long-term consequences of sustained mortality in this corridor, nor does it adequately address the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means that the standard of proving beyond reasonable scientific doubt has not been fulfilled. This situation engages the precautionary principle, which precludes a lawful conclusion in favour of consent.

In addition, the identified deficiencies indicate a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The inability to conclusively demonstrate that internationally important seabird populations will not be adversely affected results in a direct conflict with national policy.

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and contribute to the conclusion that the application does not satisfy the statutory requirements needed for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of seascape, landscape, and visual impacts is significantly lacking and fails to adequately capture the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The placement of large-scale turbines in close proximity to the coast would create an uninterrupted industrial presence, fundamentally transforming this character and leading to an irreversible alteration of the landscape.

The application also does not sufficiently represent the scale of visual change. Given their size and location, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct negative effect on visual amenity and undermine the inherent qualities of naturalness and remoteness. The assessment fails to accurately communicate the level of this impact and its significance, especially in the context of such a sensitive landscape.

There are methodological issues regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, diminishing the overall reliability of the findings.

Moreover, there is a crucial shortcoming in addressing the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected through visual and spatial relationships with the Atlantic horizon. The assessment treats these important assets as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This results in not just a visual impact but a deeper cultural and spatial detriment that has not been properly assessed in the application.

From a policy standpoint, the proposal stands in direct opposition to National Planning Framework 4 concerning the preservation of natural locations and historic assets. The extent of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case assessment further weakens any assertion of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the change is fundamental and permanent,

unable to be reduced to an acceptable level through mitigation measures.

Collectively, these shortcomings mean that the assessment does not accurately represent the impact's scale, the environmental sensitivity, or the interconnected nature of landscape and heritage. These deficiencies hinder a dependable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the preservation of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive "wall of light" effect across the western horizon. This development fundamentally alters the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. Dark skies are essential to the area's environmental quality, cultural identity, and tourism value.

Crucially, there has been no assessment of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. The omission is particularly concerning given the rising significance of dark skies to local identity and the burgeoning tourism sectors such as astro-tourism. The lack of consideration for these impacts reveals a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting because of phototaxis, which can result in disorientation and an increased risk of collision. The application lacks a lighting impact assessment or a phototaxis study, failing to evaluate how the aviation lighting may adversely affect these species or contribute to mortality rates.

This oversight is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which neglects to account for nocturnal activities and related risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

Moreover, from a policy perspective, these omissions contradict the National Planning Framework 4 concerning the protection of natural places and environmental quality. This gap also undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a vital component of the overall ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant shortfall in meeting the criteria for sustainable development as mandated by statutory responsibilities, national policy, and evidential standards. It echoes the key issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, however, is being considered under a more robust policy framework that emphasises the importance of biodiversity, peatland preservation, landscape integrity, and community wellbeing.

There is a lack of a comprehensive and reliable evidential foundation for this application. Notably, there are substantial deficiencies in baseline data, the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and critical omissions regarding impact pathways, which include nocturnal wildlife, complete onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects or residual impacts.

Procedural inadequacies are evident as well. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment represents a significant omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural landscapes, and cultural heritage. There is insufficient evidence to support that health and wellbeing impacts are acceptable, nor is there demonstrable net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent in certain aspects. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The plethora of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority is compelled to either refuse consent on these grounds or invoke the appropriate regulatory provisions to necessitate the submission of the required missing information.

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

Additional Comments

Having worked on the island in an animal welfare position, I have seen first hand the negative impact from bird collisions with these turbines. Also having camped out near three of the island turbines, the noise pollution is horrendous. Imagine the noise pollution from many turbines. Also the proposed storage facilities are hideous and too large.

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: 6EF6DA09

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. This objection arises from a thorough review of the Environmental Impact Assessment Report and supporting documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The application employs a flexible design framework, which obscures a clear understanding of potential significant effects. Additionally, the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The proposal presents clear and substantive conflicts with established policies. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests essential for consent and undermine the capability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises considerable concerns regarding landscape capacity, visual dominance, and overall environmental impact due to the large turbines' proximity to the shoreline. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent overview of the expected environmental effects of the proposed project. The employment of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and hinders the application of a worst-case scenario analysis. This deficiency compromises the assessment's integrity, resulting in a lack of clarity for both the public and the competent authority regarding the actual environmental impacts that may arise from the development.

Furthermore, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under such circumstances implies that environmental harm will be rectified post-approval, thus obstructing any substantive evaluation of the efficacy of these measures or the assessment of residual impacts. This postponement of essential information to a later stage not only contravenes the procedural norms but also undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be adequately detailed before a decision is made.

There are also critical evidential shortcomings, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where findings of negligible or non-significant effects are presented without strong supporting data. The lack of adequate information results in an unclear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not satisfy the evidential standards outlined in the Habitats Regulations necessary to rule out adverse effects with reasonable scientific certainty. This invokes the precautionary principle, particularly in relation to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to show that impacts have been thoroughly assessed or that suitable safeguards are in place regarding biodiversity protection and environmental integrity.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is essential under the Environmental Impact Assessment regime. It provides a narrative detailing the project's evolution instead of offering a reasoned comparison of

realistic alternatives based on environmental effects. This failure to properly identify, assess, and select less harmful options in favour of more damaging solutions is a significant shortcoming.

There is no clear comparison of alternative offshore locations, development scales, or design configurations. The developer has not convincingly demonstrated that the possibility of placing turbines further offshore has been seriously considered, despite the likelihood that such a move would reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the importance of proximity to shore in assessing impacts highlight the critical nature of this analysis, and its absence raises doubts about whether the proposed siting is indeed the least damaging option.

Furthermore, the assessment of cable routing and landfall is inadequate, as it does not provide sufficient evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been appropriately implemented, relying instead on post-design measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a deviation from the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a rigorous alternatives assessment, it cannot be asserted that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy compromises adherence to the National Planning Framework 4, particularly concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The absence of a structured comparative assessment constitutes a material omission, reinforcing the overall conclusion that the application has not undergone adequate evaluation and is thus unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is seriously lacking. This region is known for its sensitivity and biological activity, yet the baseline data presented is inadequate. The methodologies employed do not sufficiently capture the presence, behaviour, or habitat usage of key species, leading to a lack of reliable evidence for evaluating potential impacts.

In particular, there is a significant oversight regarding otters, classified as a European Protected Species. The application fails to properly acknowledge their active utilisation of coastal areas for foraging and movement. As a result, the assessment does not adequately consider their core foraging range and behaviour, leaving the potential impacts of construction disturbances, noise, and increased activity inadequately evaluated. Consequently, any claims regarding the absence of significant effects on

otters are fundamentally undermined.

Furthermore, the assessment of basking sharks is flawed due to an overreliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic weather conditions. This methodology likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The disregard for such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on mere assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful analysis of cumulative and indirect impacts, including seasonal changes and interactions within the broader ecosystem. This introduces uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species are notably absent. The resulting uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

Moreover, the evaluation does not adequately address the potential impacts on

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

The positioning of turbines within a designated migratory corridor presents a substantial risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application inadequately considers the long-term consequences of sustained mortality in this corridor and fails to assess the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, in conjunction with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, undermining any lawful basis for consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a significant lack of thoroughness in its assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of static assets rather than a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. By adopting a reductive approach, it overlooks the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

A notable shortcoming is evident in the handling of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet they are inaccurately classified as static features. This failure to consider their continued use and meaning leads to an incomplete understanding of the cultural implications and neglects their vital role in community life.

Moreover, the assessment disregards intangible cultural heritage, which includes the

Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are central to the area's identity yet are entirely absent from the evaluation, marking a significant oversight. Without accounting for these factors, it becomes impossible to grasp the true cultural impact of the proposed development.

Concerns extend to community rights and engagement, especially considering that the Gaelic-speaking population embodies characteristics of an Indigenous People. The absence of a process for Free, Prior and Informed Consent raises questions about the legitimacy of the assessment and fails to align with recognised principles of participatory decision-making that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the lack of a compliant Island Communities Impact Assessment, a statutory requirement established under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, the identified deficiencies place the application in direct contradiction with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear deviation from policy standards.

Collectively, the failure to address living heritage, intangible cultural value, community rights, and statutory requirements culminates in a considerable evidential gap. The cultural consequences of the development have not been adequately assessed, and the application lacks a sufficient basis for a proper evaluation of the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful assessment. The developer engaged in a Social Impact Assessment that included focus group discussions with local residents; however, the complete report remains unpublished. This results in a significant evidential gap that impedes both public understanding and the competent authority's capacity to grasp the full range of social risks identified in the developer's own research.

Summaries available reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and are therefore not merely speculative. Nonetheless, the absence of the complete assessment obstructs thorough scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Furthermore, there is evidence that the proposal is perceived as a threat to community identity and cohesion, with instances of "cultural loss" noted within the developer's findings. Despite this, such impacts have not been adequately incorporated into the primary application or accorded appropriate consideration. The failure to disclose the full Social Impact Assessment thus clouds the actual human and social costs of the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health effects is crucial for developments of this magnitude, especially in contexts where community character and functionality may be impacted. By withholding the complete dataset, the application does not provide a thorough evidential foundation for balancing benefits against harm.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid adverse effects; however, the available evidence suggests the existence of detrimental impacts that have not been thoroughly disclosed. Without the full assessment, demonstrating compliance with this policy is unattainable.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a material shortcoming within the application and reflects a failure to satisfy the evidential demands of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, together with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises significant concerns regarding the incomplete assessment of construction and pollution risks, which fails to provide adequate detail for evaluating potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application places reliance on mitigation and contingency measures that are to be prepared post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially troubling considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance

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

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

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of marine life and fisheries, which raises serious concerns about the potential impacts on the local ecosystem and economy. The waters off the West Lewis coast host a rich marine ecosystem and a vital fishing industry; however, the proposal fails to demonstrate how these crucial habitats and activities can be preserved without causing substantial disruption.

One major concern is the flawed assumption that fishing operations can be displaced without adverse effects. There is a lack of evidence supporting the availability or accessibility of alternative fishing grounds that could sustain the additional pressure resulting from displacement. This gap is critical, as it risks overfishing in other areas and could have broader economic repercussions for the local fishing fleet. The absence of a thorough, evidence-based assessment means that the true impacts on fisheries and community livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. High-energy hammer piling over an extended timeframe is expected to disturb marine life over large distances, notably impacting populations such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; nevertheless, the application downplays the seriousness of these effects without adequate justification.

The assessment also exhibits contradictions, particularly in acknowledging the need for licenses to harm European Protected Species while simultaneously characterising impacts as negligible. This inconsistency undermines the assessment's credibility and raises compliance issues with the Habitats Regulations, especially given that harm is anticipated to a level that would require legal authorisation.

Furthermore, there is a failure to account for cumulative impacts resulting from multiple stressors, including habitat disruption, noise, and the displacement of fishing activities. Without a detailed evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic context.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, thereby failing to confirm that the proposal constitutes sustainable development.

Overall, the lack of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment indicate that it is incomplete and unreliable. These shortcomings hinder a comprehensive evaluation of the potential impacts on marine life and fisheries.

TOURISM

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

Tourism has experienced substantial growth, escalating from £65 million in 2017 to more than £81.5 million, thereby supporting over 1,000 jobs and making up to 16% of the island's economy. Nonetheless, the application neglects to explore how the anticipated industrialisation of the seascape and subsequent decline in environmental quality could affect Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or risk undermining a vital and expanding sector.

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

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

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

In summary, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a significant evidential gap. This omission hampers a thorough evaluation of economic effects, supporting the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the same central issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This new proposal is now presented within a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

A complete and reliable evidential basis for determination is not provided. There are notable gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural failures are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to disclose the entire Social Impact Assessment constitutes a serious omission. These shortcomings hinder the competent authority's

ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal directly contradicts National Planning Framework 4. It does not demonstrate protection for biodiversity, natural places, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been thoroughly evaluated, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and impeding a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

I am a person with long and deep family links to Lewis. I have considered what this proposal means to the current and future environment and economy of the island and I do not think on balance that the benefits outweigh the serious effects of these structures on wildlife, marine ecology, tourism and the way of life of the people of the island. Lewis is unique in many ways and its profile across the world is rising. This development will reduce the special qualities of the island that make it such a magnet for people to come and return and so the economy will suffer in the long term.

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: BDD083F7

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. It is informed by a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant material deficiencies related to planning, environmental concerns, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a robust evidential foundation necessary for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures the potential for understanding likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the provided documentation falls short of enabling a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack sufficient supporting evidence.

There are evident and significant conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and well-being. It fails to establish compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These policy conflicts directly challenge the statutory tests required for consent and compromise the capacity of the competent authority to determine the development's acceptability within a policy context.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Taken together, the insufficient information, dependence on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance reveal that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment commissioned by the developer has not been published, creating a significant evidential gap that affects the ability of both the public and the competent authority to understand the social risks identified through the developer's own research. This lack of transparency not only undermines the Environmental Impact Assessment process but also prevents a complete understanding of the social, economic, and health impacts essential for developments of this scale.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. However, without access to the complete assessment, the findings cannot be properly scrutinised, which limits the ability to gauge their significance in the decision-making process.

Furthermore, there is evidence from the developer's own findings indicating that the proposal poses a direct threat to community identity and cohesion, with a risk of "cultural loss" highlighted. Nonetheless, these impacts have not been adequately integrated into the main application nor afforded appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social cost of the development, reflecting a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with policy cannot be established.

The procedural implications of this non-disclosure are significant, as the competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. Consequently, this omission within the application reinforces the conclusion that it lacks sufficient information and fails to support a lawful determination. Taken together, the failure to disclose the full assessment and the evidence of existing adverse impacts renders the evaluation incomplete and unreliable.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. This area is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. Introducing such industrial structures in close proximity to the shoreline would establish a persistent industrial presence, fundamentally altering the unique character of the environment and leading to a permanent transformation of the landscape.

The application fails to adequately capture the magnitude of the visual changes

anticipated. The size and proximity of the turbines would overshadow views from nearby residential areas, historic sites, and popular coastal locations, negatively impacting visual amenity and diminishing the area's defining characteristics of naturalness and remoteness. The existing assessment does not effectively communicate the significance of these impacts within the context of this sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This suggests a potential understatement of the visual impact, which compromises the reliability of the assessment.

Moreover, the assessment does not adequately evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The current assessment treats these heritage assets in isolation, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally changing how heritage assets are experienced and severing their connection to the natural horizon. This alteration represents not just a visual impact but also a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of transformation proposed conflicts with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with relevant policies.

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

Collectively, the assessment fails to represent accurately the scale of the impacts, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal outlines substantial seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. This deficiency means that a meaningful assessment of environmental effects is not possible. The application relies on undefined future mitigation and contingency measures that are to be prepared post-consent, which raises significant concerns regarding their adequacy and effectiveness.

The sensitivity of the receiving environment, particularly along the West Lewis coastline, is notable. This area supports clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks, such as sediment mobilisation and potential chemical or oil spills, it does not provide sufficient detail on preventative, control, or monitoring measures.

There is also a lack of clarity about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty includes potential effects on marine species and habitats that have already been identified as sensitive in broader assessments.

The absence of detailed emergency response procedures amplifies these concerns. By postponing contingency planning to a stage after consent, the application hinders the evaluation of whether appropriate safeguards are established to handle pollution events. This deferral introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be considered before consent is granted, and a lawful determination cannot be achieved in the absence of this critical information. 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 certainty surrounding potential impacts renders the assessment materially deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, thereby reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries within the application is notably inadequate, failing to present a thorough analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are known to host a vibrant marine ecosystem alongside a thriving fishing industry. However, the application does not adequately demonstrate how these critical habitats and activities will be preserved or sustained in the face of proposed developments without incurring significant disruption.

A critical concern arises from the presumption that fishing activities can be relocated without adverse effects. The absence of evidence to support the availability, accessibility, and capacity of alternative fishing grounds is a considerable oversight. This lack of information is particularly troubling, as it poses risks of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal raises significant risks to marine species, especially due to the underwater noise produced during the construction phase. The anticipated high-energy hammer piling over an extended period is likely to disrupt marine life across considerable distances, with particular concern for species such as dolphins. The expected disturbance to a notable segment of the local bottlenose dolphin population is alarming, yet the application diminishes the importance of these effects without adequate supporting evidence.

The application also presents inconsistencies by acknowledging the necessity for licences to allow harm to European Protected Species while simultaneously deeming the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when anticipated harm necessitates legal permission.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A failure to comprehensively evaluate these cumulative effects leaves the overall impact on marine ecosystems and socio-economic conditions indeterminate.

From a policy perspective, the application does not convincingly demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It falls short of proving that the development can coexist with established marine users or that it can mitigate unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies of the application result in an incomplete and unreliable assessment. These shortcomings obstruct any robust evaluation of the potential effects on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was noted. Despite being presented under a more robust

policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential basis for proper determination.

There are significant gaps in the baseline data provided, reliance on an undefined design envelope, unspecified mitigation measures, and crucial omissions regarding impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

Procedurally, there are notable failures as well. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment is a substantial omission. These issues prevent the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, fails to validate acceptable health and wellbeing impacts, and lacks evidence for a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately conducted, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are considerable and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidential threshold required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

In summary, the application is unfit for determination both procedurally and substantively. The extensive information deficiencies, combined with policy inconsistencies and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Additional Comments

I'm not against wind farms in general but the size of these is totally ridiculous. Far too big, not necessary to be on that scale ie dimensions.

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: 5190781F

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. Situated off the west side of the Isle of Lewis, the location is characterised by its Atlantic-facing coastline, a nearly untouched environment, and a strong cultural identity. The scale, design, and proximity of the proposal raise crucial questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework used obscures a clear understanding of potential significant effects, while the proposed mitigation measures, which have not been detailed, render it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidence.

There are evident and significant conflicts with existing policies. The proposal shows inconsistency with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national standards for protecting biodiversity, climate interests, and environmental integrity can be achieved. These conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The scale of the proposed development is unprecedented for this area, featuring large turbines situated near the shoreline, which introduces substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent and reliable account of the environmental effects associated with the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development that is ultimately constructed, leading to a failure to inform the public and the competent authority about the true extent of environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is being requested on the basis that potential environmental harm will be addressed later, which impedes a meaningful evaluation of effectiveness and the assessment of residual impacts. This deferment of essential information to post-consent stages is procedurally unacceptable, contradicting the purpose of the Environmental Impact Assessment regime that mandates the clear establishment of likely significant effects and mitigation prior to determination.

Moreover, the assessment presents significant evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes essential requirements for biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are implemented.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm illustrates a serious inadequacy in meeting the requirements for sustainable development, as measured against statutory obligations, national policy, and evidential standards. This application

echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was identified. Although the current proposal is being evaluated under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to meet essential criteria.

There are glaring omissions in the evidential basis necessary for determination. The proposal lacks comprehensive baseline data and continues to operate within an undefined design envelope. Furthermore, it leans on unspecified mitigation measures and ignores critical impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential tourism repercussions. As a result, the Environmental Impact Assessment remains inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

The application is marred by procedural shortcomings. The missing Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, and the failure to provide the complete Social Impact Assessment represents a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts National Planning Framework 4. It does not illustrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. Additionally, the lack of tourism impact modelling raises doubts about the assertion of a net economic benefit. The cumulative effects of both offshore and onshore components have not been sufficiently examined, leaving unclear implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist and may be significantly impactful. The assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential burden needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

Moreover, this proposal would lead to considerable and irreversible transformations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disturbances to cultural and visual connections, and the repercussions for tourism represent enduring effects that cannot be adequately mitigated.

Overall, the application is fundamentally and procedurally unfit for determination. The myriad information deficiencies, alongside policy discrepancies and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority is compelled to either refuse consent based on these grounds or invoke relevant regulatory provisions to mandate the submission of the outstanding

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

My family and I have lived on the Isle of Lewis for over ten years and truly appreciate the natural landscape the island provides. I am a passionate angler which I practice in my spare time as well as my chosen career as a fisheries biologist. It has given me great pleasure introducing my young daughter to the many local fishing opportunities. I sincerely hope she can grow up enjoying the natural environment and not be part of a generation that sees the island industrialised due to government ideology. I support the objection made by the Western Isles District Salmon Fisheries Board (WIDSFB). I was involved with compiling the WIDSFB objection and would like consenting officers to consider all of the points raised by the objection.

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: 05E3F9F9

