

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regimes. A comprehensive review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise primarily due to the unprecedented scale and design of the proposal, which raises questions about its compatibility with statutory requirements, national policy, and sustainable development principles. The application does not establish a sufficient evidential basis for a lawful determination. Critical environmental data is lacking, baseline information is inconsistent and limited, and several key aspects of the proposal remain undefined. The flexible design framework employed does not facilitate a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders the evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to the absence of robust supporting evidence.

Moreover, there are evident and substantive conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the proposal's acceptability in policy terms.

The proximity of large turbines to the shoreline introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the absence of adequate information, dependence on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Thus, the application must invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential information, rendering it materially deficient in its account of the potential environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This flexibility introduces significant uncertainty and hinders the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, obstructing both the public and the competent authority from fully comprehending the actual environmental effects.

Additionally, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought under the premise that any environmental harm will be addressed at a subsequent stage. This approach inhibits a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and corresponding mitigations be clearly established prior to determination.

Furthermore, significant evidential deficiencies arise from gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. These issues lead to uncertainty surrounding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result of these shortcomings, the application fails to satisfy the evidential threshold mandated under the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that the impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation, and the existence of gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot appropriately determine the application based on the information available.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under consideration presents significant deficiencies in its assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline

as a living cultural landscape, where the environment, language, tradition, and community are interconnected. Instead, the application adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static features. This mischaracterisation neglects their continued use and significance, as well as the potential impact of development on their setting. Consequently, this results in an incomplete evaluation of cultural effects and overlooks their essential role in community life.

Furthermore, the application neglects to consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the assessment, representing a significant oversight. The lack of consideration for these factors impedes a proper understanding of the cultural impact of the development.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity akin to that of Indigenous Peoples, has not undergone a process of Free, Prior and Informed Consent. This absence of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation concerning cultural and environmental interests.

Additionally, a critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents 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 account for both tangible and intangible heritage, along with the disregard for living cultural practices, marks a clear deviation from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not offer a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly lacking in transparency and therefore cannot meet lawful evaluation standards. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This omission creates a substantial evidential gap, hindering both public understanding and that of the competent authority regarding the social risks outlined in the developer's own research.

Residents are reportedly facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development. These findings arise from direct engagement and are firmly grounded in evidence. Nonetheless, the failure to release the complete assessment restricts thorough scrutiny of its findings, which limits the ability to evaluate their significance in the decision-making process.

Furthermore, the proposal is viewed by many as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite these serious implications, they have not been adequately integrated into the main application or assigned appropriate weight. The non-disclosure of the full Social Impact Assessment thus conceals the true human and social costs involved in the development.

This lack of transparency critically undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, particularly where community character and functioning may be compromised. The application, by failing to provide the complete dataset, does not present a thorough evidential foundation needed for assessing the balance between potential benefits and harms.

In terms of policy compliance, the application falls short of demonstrating alignment with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes while avoiding detrimental effects, yet available evidence points to existing adverse impacts that have not been fully disclosed. Without the complete assessment, the claim of compliance with this policy remains unsubstantiated.

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

When considered collectively, the non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts results in an incomplete and unreliable assessment. This lack of information precludes a lawful determination and supports the conclusion that the application lacks sufficient data.

CONSTRUCTION AND POLLUTION RISKS

The application presents an incomplete assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would be prepared after consent, which prevents any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is concerning due to the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on the methods for preventing, controlling, or monitoring these risks.

There is also ambiguity surrounding the scale and behaviour of sediment plumes generated by 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 applies 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 heightens these concerns. By postponing contingency planning to after consent, the application hampers the ability to evaluate whether suitable safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and when such information is absent, a lawful determination cannot be reached. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty about potential impacts render the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and further confirm that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights serious deficiencies in meeting the standards of sustainable development, as required by statutory obligations, national policy, and evidential benchmarks. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, when the

extent of industrialisation was deemed unacceptable. This current application, while presented under a framework that places increased importance on biodiversity, peatland preservation, landscape integrity, and community welfare, fails to adequately address these priorities.

A reliable evidential foundation for the proposal is noticeably absent. There are significant gaps in baseline data, the design envelope remains undefined, and mitigation measures have not been clearly specified. Additionally, essential impact pathways—including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are overlooked. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, the process surrounding the application shows clear procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to present the complete Social Impact Assessment constitutes a critical omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are satisfactory and lacks evidence of net economic benefits, primarily due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Evaluations related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, which engages the precautionary principle and precludes a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal is set to bring about considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and negative effects on tourism constitute enduring impacts that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with policy inconsistencies and unresolved environmental risks, inhibit a lawful and evidence-based decision. It is imperative that the competent authority either rejects the application on these grounds or utilises the appropriate regulatory measures to obtain the missing information.

As such, we formally request that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

My family are from the Hebrides and live on the islands. Health impacts from sound pollution on local residents wellbeing is important and need to be held in the first regard.

This proposal needs to be consulted with the residents and not just bulldozed into an agreement.

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: B0073BC6

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment requirements. It is founded on a review of the Environmental Impact Assessment Report and related documents, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area renowned 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 shore, raises serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework obstructs a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are evident and substantial policy conflicts associated with the proposal. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal raises further concerns, with large turbines positioned near the shoreline, raising issues related to landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In this context, it is imperative that the precautionary principle is applied.

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.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is fundamentally lacking and fails to provide the necessary detail for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application relies on mitigation and contingency measures that would be developed after consent, which limits any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises particular concerns in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies for these risks.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are established to respond to pollution incidents. This situation introduces procedural risks and diminishes the ability of the competent authority to assess the effectiveness of environmental protection measures during the decision-making process.

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

In summary, the lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application remains incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is fundamentally lacking, as it does not fully address the impacts associated with what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore components is crucial, yet they have been assessed in isolation, leading to a disjointed understanding of the environmental and socio-economic repercussions.

The onshore aspects encompass cabling that traverses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas

of deep peat, particularly within Barvas Moor, which serves as a vital carbon reservoir and ecologically important habitat. The current application fails to deliver a thorough assessment of these impacts, which hinders the comprehension of the project's overall environmental implications.

By neglecting or postponing the evaluation of onshore effects, the application obstructs an accurate appraisal of cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the division of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities remain inadequately examined.

There are substantial risks posed to sensitive environments, including machair systems and peatland areas that are safeguarded by policy. The application does not provide evidence that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant gap regarding the protection of biodiversity.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this matter or show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through operational croft land presents possible conflicts with established land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, prompting doubts about its feasibility and lawful execution.

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

In summary, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of proof concerning environmental and land use impacts render this part of the application inadequate and untrustworthy, ultimately obstructing a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exhibits serious deficiencies that compromise its compliance with sustainable development criteria as mandated by statutory duties, national policy, and evidential standards. Similar issues that led to the rejection of the Lewis Wind Power proposal in 2008 are apparent, as the current application presents a level of industrialisation that remains unacceptable despite being submitted under a more robust policy framework that emphasises biodiversity,

peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis necessary for a sound determination of the application. The use of an undefined design envelope is problematic, and there is a lack of specified mitigation measures. Furthermore, the application omits critical impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission that inhibits the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. The absence of tourism impact modelling fails to provide evidence of any net economic benefit. Moreover, there has been insufficient assessment of the cumulative impact from both offshore and onshore elements, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surround environmental risks, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. This lack of thorough investigation, and instances of internal inconsistency, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, thereby hindering the capacity to lawfully conclude that impacts are acceptable.

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

In summary, the application is unfit for determination both procedurally and substantively. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the relevant regulatory provisions to require the submission of the necessary 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: B41D0540

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate. It does not offer a clear or trustworthy account of the likely environmental effects of the proposed development. The use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes and layouts, creates considerable uncertainty. This uncertainty hinders a consistent worst-case scenario application and undermines the assessment's integrity. As a result, the potential impacts presented may not accurately reflect the final development, limiting both public understanding and that of the competent authority regarding the true extent of environmental effects.

The application depends significantly on mitigation measures and management plans that remain undefined. Seeking consent based on the promise to address environmental harm later prevents a thorough evaluation of these measures' effectiveness and the assessment of any residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's aim, which is to establish significant effects and mitigation clearly before any determination is made.

There are serious evidential shortcomings, including insufficient baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty about the scale and significance of impacts. Conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of comprehensive information obscures understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show 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, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental effects, meaning that the competent authority cannot properly 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 assessment of the proposed development lacks reliability due to significant internal inconsistencies, methodological weaknesses, and gaps in evidence. It fails to demonstrate that internationally important seabird populations, which are already experiencing declines, will not be adversely affected. The west coast of the Isle of Lewis, known for its key foraging areas and migratory pathways, is significantly impacted by the siting of turbines within a recognised migratory corridor. This creates a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland, and the application does not sufficiently assess the long-term implications

of sustained mortality within this corridor.

Contradictions within the application further undermine its credibility. The developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which suggests that significant harm is expected. Such inconsistency raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are not adequately supported by the evidence provided.

Moreover, the assessment does not adequately address the impact on seabirds associated with protected sites like the Lewis Peatlands and St Kilda. The significance of these feeding grounds is insufficiently acknowledged, and reliance on modelling approaches adds uncertainty, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain poorly understood.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and precludes a lawful conclusion that supports consent. The identified deficiencies also signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. Ultimately, the inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the overall conclusion is that the application does not fulfil the statutory requirements needed for determination, due to the unreliability of the assessment arising from its inherent inconsistencies, methodological flaws, and lack of sufficient evidence.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is profoundly insufficient, neglecting to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interwoven. The application reduces heritage to mere isolated assets, failing to recognise their dynamic social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice, yet they are mischaracterised as static features in the assessment, overlooking their ongoing significance, usage, and the potential impact of development on their surroundings. This inadequate portrayal leads to a flawed evaluation of cultural effects, ignoring their vital role in community life.

Additionally, the assessment does not take into account intangible cultural heritage elements, including the Gaelic language, traditions, and the deep-rooted relationship between the community and its coastal environment. These aspects are crucial to the area's identity yet are entirely excluded from consideration, marking a significant shortfall. Without evaluating these factors, the cultural ramifications of the development remain unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that meets the recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not align with established principles of participation in matters affecting cultural and environmental interests.

A major procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings position the proposal in stark contradiction to National Planning Framework 4, especially concerning the safeguarding of historic assets and places. Ignoring both tangible and intangible heritage and failing to recognise living cultural practices signifies a significant deviation from policy requirements.

In summary, the shortcomings in assessing living heritage, intangible cultural values, community rights, and legal obligations create a considerable evidential gap. The cultural impacts of the development remain inadequately evaluated, and the application does not establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is significant and fundamentally undermines the evaluation's legality. Despite the developer commissioning a Social Impact Assessment, which included focus groups with local residents, the complete report remains unpublished. This lack of disclosure creates a substantial evidential gap, obstructing both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Summaries that are available indicate that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement and are not mere speculation. However, the absence of the complete assessment hinders the scrutiny of

these findings and limits the capacity to evaluate their significance in the decision-making process.

Furthermore, there is an indication that the proposal is viewed as a direct threat to the community's identity and cohesion, with "cultural loss" identified in the developer's own findings. Yet, these impacts have not been adequately incorporated into the main application or given the appropriate weight they deserve. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of clarity significantly compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly where the character and functioning of the community may be at risk. The failure to provide the complete dataset means that the application does not furnish a thorough evidential basis for weighing the benefits against the harms.

From a policy standpoint, the application does not satisfactorily demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the existing evidence suggests adverse effects that have yet to be fully disclosed. Without the full assessment, compliance with this policy cannot be substantiated.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application presents a proposal that is fundamentally deficient in its assessment of construction and pollution risks, failing to provide the necessary detail for evaluating potential environmental effects. In a high-energy Atlantic environment, substantial seabed preparation and installation works are planned, yet the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. Instead, the application leans on the promise of future mitigation and contingency measures, to be formulated post-consent, which obstructs any genuine assessment of their adequacy or potential effectiveness.

Particularly troubling is the reliance on undefined future measures, given the sensitivity of the environment that the West Lewis coastline represents. This area is home to clean

coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not offer sufficient detail on preventive, control, or monitoring strategies.

Moreover, uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation is a significant concern. Without rigorous modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological implications of such impacts. This uncertainty also extends to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures, which raises further alarms. By postponing the planning of contingency measures until after consent is granted, the application prevents a proper evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk, which undermines the ability of the competent authority to adequately assess environmental protection measures during the determination process.

From a regulatory standpoint, the delay in establishing critical environmental safeguards stands in opposition to the requirements dictated by the Environmental Impact Assessment regime. It is essential that likely significant effects and corresponding mitigation are assessed before consent is granted, and when such information is absent, a lawful determination becomes impossible. Furthermore, the application fails to demonstrate compliance with policy stipulations regarding environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminates in a materially deficient assessment. These inadequacies hinder a robust evaluation of construction and pollution risks, thereby reinforcing the assertion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a critical evaluation of nocturnal wildlife and dark skies, representing a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the environmental quality, cultural identity, and tourism of the area. The introduction of permanent red aviation lighting, which would be visible from great distances, threatens to create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to assess how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the relevance of dark skies to the area's cultural identity and the development of astro-tourism. The neglect to consider these impacts creates a

notable gap in the overall landscape and environmental assessment.

Equally alarming is the absence of any analysis regarding the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, leading to disorientation and a heightened risk of collision. The application does not include a lighting impact assessment or a study on phototaxis, which means the potential adverse effects of aviation lighting on these species and their mortality rates are left unexamined.

The situation is further complicated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data leads to a critical inadequacy in understanding ecological impacts.

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

From a policy standpoint, this omission is at odds with National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

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

TOURISM

The application acknowledges that 86% of visitors are drawn by scenery. However, it does not provide a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers or overall economic contributions. The assessment of tourism impacts is materially deficient, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is fundamentally dependent on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness.

Tourism has experienced substantial 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. Despite this significant increase, the application neglects to model how the industrialisation of the seascape and loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the region.

Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or adversely impact this established and growing sector.

Additionally, the assessment overlooks the vital role of environmental quality in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experience, as well as emerging markets such as nature-based tourism and astro-tourism, are not addressed. The absence of a Dark Skies Assessment further exacerbates this oversight, creating a significant gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a community with limited economic diversification, the failure to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the need to show net benefit. It also conflicts with strategic objectives that highlight tourism as a priority growth sector. Furthermore, it does not provide adequate evidence to enable the competent authority to assess the economic consequences of the proposal.

The collective failure to quantify tourism impacts, assess environmental drivers of visitor behaviour, and consider the island's economic dependency results in a considerable evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal reveals critical shortcomings in its approach to sustainable development, failing to meet statutory duties, national policy, and evidential standards. This application mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key factor. Now, under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, these same concerns are raised yet again.

A reliable evidential basis for the determination is notably lacking in this proposal. There are significant gaps in baseline data, an ambiguous design envelope is used, and the mitigation measures proposed remain unspecified. Furthermore, crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have not been addressed. As a result, the Environmental Impact Assessment is inadequate, leaving a comprehensive understanding of likely significant effects or residual impacts unattainable.

The procedural aspects of the proposal also exhibit clear failures. The missing

compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, this proposal is at odds with National Planning Framework 4, as it fails to protect biodiversity, natural landscapes, and cultural heritage. It does not adequately address health and wellbeing impacts and lacks evidence of any net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete, and some inconsistencies exist within the findings. The evidential threshold required to confidently exclude adverse effects has not been met, activating the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental risks, hinder any lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

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

Additional Comments

We regularly visit Lewis for our mental health and spend a significant amount of time in and around Barvas for the calm and closeness to nature that the area affords. The idea of massive off-shore windfarms so close to habitations will leave a very nasty taste in our mouths and cause us to rethink our holiday time.

These plans will affect nature and humans for decades to come, while also leaving a lasting ecological damage that will not be possible to clean up. The area is already under threat and it needs protecting, not further degradation.

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: 21EE902A

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

Dear Sir/Madam

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

A review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application does not provide an adequate evidential basis for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Additionally, many aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to support an informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Furthermore, there are notable policy conflicts, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts undermine the ability of the competent authority to determine that the development is acceptable within the required policy framework.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance highlight that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial information and does not offer a full, transparent, or reliable account of the likely environmental effects

associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates significant uncertainty. This variability undermines the integrity of the assessment and means that the impacts outlined may not correspond to the actual development that would be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the promise that environmental harm will be addressed later prevents a meaningful evaluation of these measures' effectiveness or an accurate assessment of residual impacts. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the intentions behind the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly established before determination.

There are also serious evidential gaps within the report, which include deficiencies in baseline data, limitations in methodology, and an over-reliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot comply with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including the requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully evaluated or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, a lack of specified mitigation, and insufficient baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These significant deficiencies impede a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity lacks depth and fails to recognise the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are deeply intertwined. Rather than appreciating heritage as a dynamic aspect of community life, the application reduces it to isolated, unchanging assets. This oversimplification overlooks the ongoing social, cultural, and spiritual significance these elements hold for the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice; however, the assessment improperly categorises them as

mere static features. This mischaracterisation neglects their continued use and significance, as well as the impact of development on their surroundings. Such an oversight leads to an incomplete understanding of cultural effects and disregards the integral role these sites play in community life.

Moreover, the assessment omits intangible cultural heritage, including the Gaelic language and traditions, alongside the longstanding relationship between the community and the coastal environment. These vital elements are essential to the area's identity yet are entirely absent from consideration, representing a grave oversight. Without acknowledging these aspects, the true cultural ramifications of the proposed development remain inadequately understood.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population 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 genuine engagement raises questions about the validity of the assessment and contravenes established principles for involving communities in decisions that impact cultural and environmental interests.

A critical flaw in the process is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These shortcomings directly conflict with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application lacking a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall evaluation of social impacts, health, and wellbeing associated with the proposed development is insufficient and lacks the necessary transparency for a lawful assessment. Although the developer engaged local residents through a Social Impact Assessment and conducted focus groups, the complete report remains unpublished. This omission creates a significant gap in evidence, hindering both public understanding and the ability of the competent authority to grasp the full extent of social risks identified by the developer's research.

Available summaries reveal that local residents are experiencing notable stress,

anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement and should not be regarded as speculative. However, without access to the complete assessment, proper scrutiny of these findings is impeded, limiting the capacity to ascertain their relevance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings indicating a risk of "cultural loss." Despite this, such impacts have not been adequately incorporated into the main application or given the attention they warrant. The failure to disclose the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A thorough understanding of social, economic, and health consequences is vital for developments of this magnitude, particularly when community character and functionality may be at stake. The application's inability to present the full dataset results in an incomplete evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster 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 prove compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a substantial omission within the application, failing 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 current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently address the degree of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately portray the extent of this visual change.

The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the true extent of visual impact has been underestimated, which calls into question the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than recognising these sites as interdependent, the assessment treats them as isolated entities, resulting in a partial evaluation of their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This alteration represents not merely a visual impact but a broader cultural and spatial detriment that has not been adequately evaluated within the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change proposed is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines claims of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is inadequate, lacking the necessary detail to evaluate the potential environmental effects associated with the proposal. This initiative entails significant seabed preparation and installation activities

within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on mitigation and contingency measures that would only be formulated after consent has been granted, thereby obstructing any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises serious concerns, particularly considering the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and critical habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate details on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, determining the extent, duration, or ecological consequences of these impacts is unfeasible. This uncertainty also applies to potential effects on marine species and habitats already identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application hampers the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant likely effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. The application also fails to illustrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally deficient. These shortcomings impede a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines alongside the onshore works is fundamentally lacking and does not account for the full range of impacts related to what is essentially one integrated project. The linkage between the offshore and onshore elements is critical, yet the two are evaluated separately, leading to a disjointed approach that

conceals the true extent of the environmental and socio-economic effects.

Onshore developments include the installation of cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access infrastructure traversing sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically significant habitat. The application fails to deliver a thorough assessment of these impacts, obstructing a comprehensive understanding of the project's overall environmental footprint.

By excluding or postponing the evaluation of onshore impacts, the application hinders the accurate assessment of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components in unison; however, the distinct separation of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and local communities are not fully comprehended.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under policy measures. The application lacks evidence demonstrating that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place. This results in a significant evidential gap regarding the protection of biodiversity.

Concerns about carbon balance also arise from the proposal. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not furnish evidence that the necessary consents or processes have been undertaken, casting doubt on the project's deliverability and lawful execution.

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

Overall, the disconnection between project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts leave this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in the environmental quality, cultural identity, and tourism potential of the area.

The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment. This aspect has not been assessed in the Environmental Impact Assessment, representing a material omission that undermines the application.

The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been evaluated. Such an omission is particularly significant given the importance of dark skies to the region's identity and to emerging sectors like astro-tourism. The failure to address these impacts results in a considerable gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are particularly affected by artificial lighting due to phototaxis, leading to disorientation and increased risks of collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the resultant increase in mortality, have not been considered.

This shortcoming is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the application does not assess this risk. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

Without a proper assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would suffer adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and preventing a lawful determination.

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

In summary, the lack of assessment for 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 application does not adequately assess the impact on tourism, a crucial sector for the Isle of Lewis economy. This sector relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative analysis of how large-

scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle of Lewis has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear if the proposed development would generate a net economic benefit or harm an already established and growing sector.

The assessment neglects to address the significance of environmental quality in fostering tourism. Unspoiled landscapes and dark skies are vital to visitor experience, including emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding the impacts on a key and expanding part of the local economy.

In an island community with limited economic diversification, failing to evaluate the impacts on tourism carries broader ramifications for employment, local businesses, and community sustainability. The omission of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show compliance with National Planning Framework 4, especially regarding economic impact and the need to demonstrate a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic implications of the proposal.

In summary, the inability to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic dependencies results in a significant lack of evidence. This hinders a thorough evaluation of the economic effects and supports the view 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.

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: 27C6BCC4

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. Upon reviewing the Environmental Impact Assessment Report and accompanying documentation, it is evident that there are significant deficiencies across various dimensions, including planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The scale and design of the proposed development, particularly its proximity to the shoreline, raise essential questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential foundation for a lawful decision. There are notable omissions of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

Furthermore, there are clear and significant conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. Such conflicts are pivotal to the statutory tests necessary for consent and hinder the ability of the competent authority to determine the development's acceptability in terms of policy.

The unprecedented scale of this proposal in this location, combined with the placement of large turbines in close proximity to the shoreline, raises serious concerns regarding landscape capacity, visual impact, and environmental consequences. Taken collectively, the absence of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy reflect that the application is incomplete and insufficient for lawful consideration. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive and trustworthy evaluation of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hinders the effective application of a worst-case scenario, ultimately compromising the assessment's integrity. Consequently, the impacts outlined may not accurately represent the development that will be constructed, preventing both the public and the competent authority from grasping the true scale of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Seeking consent on the premise that environmental harm will be rectified at a later stage undermines any meaningful evaluation of their 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 likely significant effects and mitigation measures be clearly established prior to determination.

Additionally, there are major evidential shortcomings, including gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This scenario invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to align with National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it is unable to demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of clearly specified mitigation measures, and gaps in baseline data collectively render the Environmental Impact Assessment Report 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 information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to demonstrate a proper assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application presents a narrative that outlines the project's

evolution. This methodology does not establish that less harmful options have been adequately identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not prove that the developer has seriously explored the option of positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact further highlight the need for such analysis. The failure to include this evaluation undermines any conclusion regarding whether the proposed siting constitutes the least damaging choice.

The shortcomings also extend to the evaluation of cable routing and landfall options, with insufficient evidence provided to show that alternative routes have been thoroughly examined to avert or lessen impacts on sensitive receptors. This encompasses locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis signifies that mitigation by design has not been employed, with the focus instead being on post-design mitigation measures.

Consequently, the application does not prove that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This omission constitutes a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives available. The lack of a comprehensive assessment of alternatives raises concerns regarding the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation to 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 application for the proposed development is fundamentally flawed, as the ornithological assessment reveals significant gaps in evidence and internal contradictions that undermine its conclusions. Situated within key foraging areas and migratory pathways, the development threatens internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. However, the application fails to convincingly demonstrate that these species will not be adversely affected.

A notable contradiction arises within the application, where the developer asserts there are no significant adverse effects while also pursuing a Habitats Regulations derogation

case, which is only necessary when substantial harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that its conclusions lack support from the underlying evidence. Moreover, the assessment does not sufficiently prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been adequately recognised, and the reliance on modelling approaches introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given incomplete baseline data and a lack of understanding of behavioural responses.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape wherein environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static features rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the handling of sites with cultural importance, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment inaccurately categorises them as static elements. This failure to acknowledge their continued use, significance, and the potential impacts of development on their context leads to an incomplete

understanding of cultural effects and ignores their integral role in community life.

The assessment further neglects the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity yet are entirely omitted from the evaluation, resulting in a significant gap. Without addressing these aspects, a comprehensive understanding of the cultural impact of the proposed development is unattainable.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, which embodies a unique cultural identity characteristic of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful involvement undermines the credibility of the assessment and fails to adhere to established principles of participatory decision-making related to cultural and environmental interests.

A critical procedural oversight is the failure to complete a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to scrutinise the social, cultural, and economic effects on the island community. This omission is significant and precludes a lawful determination of the application.

From a policy standpoint, these deficiencies create a direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear departure from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and statutory requirements results in a considerable evidential void. The cultural impacts of the proposed development have not been adequately assessed, rendering the application insufficient for ascertaining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing 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 visual impacts on the landscape, seascape, and cultural heritage is profoundly inadequate, failing to capture the extent of change and the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a notable sense of remoteness. The proposed large-scale turbines situated near the shoreline would impose a continuous industrial presence, fundamentally altering the character of the area and resulting in a permanent and irreversible transformation of the landscape.

This application does not accurately depict the scale of the visual change that would occur. The turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the severity of this impact or its significance within such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual

viewpoints. Evidence indicates that some viewpoints may fail to reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which compromises the credibility of the assessment.

Additionally, the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage is a serious shortcoming. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment neglects this interdependence, treating these assets as isolated, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship with the natural horizon. This represents a visual impact alongside a broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal 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 comprehensive worst-case assessment further challenges any assertion of compliance with policy.

Moreover, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be a dominant and unavoidable feature. The resulting change is, therefore, fundamental and permanent, not something that can be reduced to an acceptable level through mitigation.

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and emphasise that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are crucial for evaluating potential environmental effects. It involves extensive seabed preparation and installation work in a high-energy Atlantic environment, yet fails to provide comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures to be formulated after consent is granted, hindering any thorough assessment of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises substantial concerns, particularly given the sensitivity of the local environment. The West Lewis coastline is home to

clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on strategies for prevention, control, or monitoring of these issues.

There is also significant uncertainty surrounding the scale and behaviour of sediment plumes that could result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

Furthermore, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be evaluated before consent can be granted, and without this crucial information, a lawful determination cannot be reached. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of well-defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These issues impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries associated with the application is inadequate, failing to offer a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast host a rich marine ecosystem alongside an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses will be protected or maintained without significant disruption.

A notable concern arises from the assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This gap is critical, as such displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the effects on fisheries

and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is concerning; nevertheless, the application tends to underestimate the significance of these effects and lacks adequate supporting evidence.

There exists a contradiction within the application regarding the necessity of licences for harming European Protected Species, while impacts are concurrently described as negligible. This inconsistency undermines the assessment's credibility and raises serious questions about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus hindering the determination of whether the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application lacks a thorough assessment of onshore infrastructure, which is crucial given that the offshore turbines and onshore works are interconnected. By evaluating these components separately, the true scale of environmental and socio-economic impacts is obscured, leading to a fragmented understanding of the project's overall footprint.

Onshore works involve significant undertakings such as cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities will require excavation through areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The current application fails to deliver a comprehensive evaluation of these impacts, which hinders an accurate understanding of the environmental consequences.

By neglecting to assess onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the disjointed assessment means that the combined impacts on peatlands, habitats, and local communities remain poorly understood.

There are notable risks to sensitive habitats, including machair systems and peatland environments that are under policy protection. The application does not convincingly show that the impacts on these habitats have been fully examined or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance, as disturbance of peatland could release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this critical issue or prove that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, raising doubts about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal's failure to assess the impact of artificial lighting on dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline features exceptionally dark skies, which are vital for the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible from great distances, would create an intrusive "wall of light" effect that would drastically change the night-time environment.

There is no evaluation of how this lighting would affect visual amenity, landscape character, or the experiences of residents and visitors, despite the importance of dark skies to the identity of the area and the burgeoning sector of astro-tourism. This omission creates a clear deficiency in the overall landscape and environmental

assessment.

Moreover, there is a troubling lack of consideration for nocturnal wildlife impacts. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and a heightened risk of collisions. The application does not provide any assessment of lighting impacts or conduct a phototaxis study, failing to explore how the proposed aviation lighting might adversely affect these species or contribute to increased mortality rates.

This shortcoming is aggravated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated dangers. Kittiwakes, for example, may forage or migrate at night and are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts involved.

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

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an integral aspect of the overall environment.

In summary, the lack of assessment regarding dark skies and nocturnal wildlife is a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The proposed development lacks a comprehensive assessment of tourism impacts, failing to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, near-pristine landscapes, dark skies, and a profound sense of remoteness. While the application recognises that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how the introduction of large-scale offshore infrastructure may affect visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and contributes up to 16% of the island's economy. However, the application neglects to model the

potential impacts of industrialisation on the seascape and the consequent loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. This lack of analysis obscures whether the proposed development would yield a net economic benefit or adversely affect this established and growing sector.

Furthermore, the evaluation fails to acknowledge the significance of environmental quality in enhancing tourism. The unspoiled landscapes and dark skies are crucial to visitor experiences and the growth of niche markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, leading to a notable gap in understanding the potential impacts on an acknowledged and expanding segment of the local economy.

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

On a policy level, the application fails to demonstrate alignment with National Planning Framework 4, particularly regarding economic impact and the necessity to show net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and considering the island's economic reliance culminate in a substantial evidential gap. This gap undermines a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application echoes the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this application under a stronger policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community welfare, does not mitigate these concerns.

The evidential basis for the application remains incomplete and unreliable. There are crucial gaps in the baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures raises significant concerns. Key impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism impacts. Consequently, the Environmental Impact Assessment lacks completeness, hindering a thorough

understanding of likely significant effects and residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory obligation under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact Assessment represents a significant omission, limiting the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, thus 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 environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty around environmental risks, which may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and detrimental impacts on tourism are permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory provisions to mandate the submission of the outstanding information.

Thus, 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: 765F478E

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 for consideration under relevant marine licensing and Environmental Impact Assessment frameworks. Our objection arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The site is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the project with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There is a concerning absence of critical environmental data, and the baseline information provided is both limited and inconsistent, leaving several key aspects of the proposal undefined. The proposed use of a flexible design framework hampers a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

Substantial policy conflicts have been identified. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that it can meet national obligations for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests required for consent and diminish the capacity of the competent authority to determine that the project meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned dangerously close to the shoreline. This raises critical issues regarding landscape capacity, visual dominance, and environmental impact. The cumulative effect of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and evident policy non-compliance underscores that the application is incomplete and cannot support a lawful determination. In light of these findings, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime requires a thorough assessment of alternatives, which is notably absent in this application. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a complete lack of transparent or evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately explored the option of positioning turbines further offshore, an approach that could potentially mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, as well as the critical role that proximity to the shore plays in determining impact, the omission of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

The inadequacies also extend to the assessment of cable routing and landfall. There is insufficient evidence demonstrating that alternative routes have been thoroughly investigated to avoid or minimise impacts on sensitive receptors, which include culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the design did not incorporate mitigation by design, instead relying on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, ultimately hindering the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. The absence of a robust alternatives assessment leads to the conclusion that the proposal does not embody a sustainable or policy-compliant solution.

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not been sufficiently evaluated and thus cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is significantly inadequate, failing to offer a thorough or dependable understanding of the ecological receptors in the West Lewis coastal environment. This area is characterised by high sensitivity and biological activity, yet the baseline data remains incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, or habitat utilisation of various species. Consequently, the assessment lacks a robust evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, a species afforded protection under European law. The application does not sufficiently acknowledge or assess their active use of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural patterns raises concerns, as it means that the implications of construction-related disturbances, noise, and increased human activity have not been adequately evaluated. This lack of consideration undermines any claims regarding the

absence of significant effects on the otter population.

In addition, deficiencies are present in the assessment of basking sharks, which relies on aerial surveys that introduce a considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially in light of established land-based observations that indicate frequent use of these waters. The failure to integrate or adequately consider this data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological flaws lead to conclusions of negligible or non-significant effects being derived from assumptions rather than solid evidence. The absence of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth in the Environmental Impact Assessment regime and the National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced by these deficiencies obstructs the ability to rule out adverse effects with reasonable scientific certainty, thus necessitating the application of the precautionary principle. Under these circumstances, the grant of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development's impact on seabirds is fundamentally flawed. It presents significant gaps in evidence and contains internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate adequately that these species will not be adversely affected. Key foraging areas and migratory pathways are situated near the development, yet the assessment does not thoroughly evaluate risks related to displacement, collision, or habitat loss.

There is a critical contradiction within the application itself. While the developer asserts that there will be no significant adverse effects, they simultaneously submit a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that the conclusions drawn are not backed by the evidence provided.

The assessment lacks sufficient proof that seabirds linked to protected sites, such as

the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used may underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Placing turbines within a recognised migratory corridor adds another layer of risk. This placement effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of ongoing mortality in this corridor have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations.

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

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These issues hinder a robust 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 proposed development raises significant concerns regarding the cultural heritage and community identity associated with the West Lewis coastline. The assessment fails to recognise this area as a dynamic cultural landscape where the environment, language, tradition, and community interconnect. Instead, it adopts a reductive view that treats heritage merely as a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A notable shortcoming of the assessment is its treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet the evaluation categorises them as static features without regard for their continued use and meaning. This mischaracterisation compromises a thorough evaluation of cultural impacts and overlooks their significance within community life.

The assessment also disregards intangible cultural heritage elements, such as the

Gaelic language and local traditions, along with the long-standing relationship between the community and the coastal environment. These components are vital to the identity of the area but have been entirely omitted from the assessment, leading to a critical gap in understanding the cultural implications of the development.

Concerns regarding community rights and engagement further complicate the application. The Gaelic-speaking population is recognised as possessing a distinct cultural identity akin to that of Indigenous Peoples; however, the absence of a Free, Prior and Informed Consent process undermines the integrity of the assessment. This lack of meaningful engagement fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

Moreover, a significant procedural failure is evident in the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The omission of this assessment impedes the competent authority's ability to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community, thus hindering lawful determination.

From a policy standpoint, the deficiencies in the assessment place the proposal in opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, constitutes a clear deviation from established policy requirements.

In summary, the assessment's inadequacies in addressing living heritage, intangible cultural values, community rights, and statutory obligations result in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, rendering the application insufficient for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is critical and has severe implications for the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This failure to disclose vital information creates a significant evidential gap, preventing both the public and the competent authority from understanding the complete range of social risks highlighted by the developer's own research.

Available summaries show that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement and are not based on speculation. However, the lack of access to the full assessment hinders proper scrutiny of these findings, limiting the capacity to assess their importance in the decision-making process.

Moreover, evidence indicates that the proposal is viewed as a direct threat to community identity and cohesion, with findings pointing to a potential "cultural loss." Yet, these impacts have not been adequately incorporated into the primary application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency severely undermines the Environmental Impact Assessment process. It is crucial to have a complete understanding of the social, economic, and health implications for developments of this magnitude, especially when community character and function may be at stake. Without the full dataset, the application does not provide a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application is unable to demonstrate its compliance with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and mitigate harm, yet the evidence currently available suggests existing adverse effects that remain undisclosed. In light of the absence of the complete assessment, compliance with this policy is unprovable.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material flaw within the application and a failure to meet the evidential standards mandated by the Environmental Impact Assessment regime.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the view that the application lacks adequate supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would introduce a continuous and dominant industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application fails to represent the full extent of this visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. Furthermore, the assessment does not adequately convey the significance of this level of impact in the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the risk of understating the magnitude of visual impact and questions the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a wider landscape setting, interconnected by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The potential 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 situation not only presents a visual impact but also signifies broader cultural and spatial harm that the application has not adequately assessed.

From a policy standpoint, the proposal directly conflicts with the National Planning Framework 4 concerning the protection of natural environments and historic assets. The extent of change proposed is at odds with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further challenges any assertion of compliance with policy.

Ultimately, 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 capable of being reduced to an acceptable level through any means of mitigation.

In conclusion, the assessment is deficient in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current assessment of construction and pollution risks is inadequate, lacking the necessary detail for a proper evaluation of environmental effects. The proposal entails significant seabed preparation and installation activities within a dynamic Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be formulated after consent, which prevents any meaningful assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is especially alarming due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disruption and pollution. While the application recognises the risks of sediment mobilisation and potential chemical or oil spills, it fails to provide adequate details on prevention, control, or monitoring strategies.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. In the absence of thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a stage following consent, the application obstructs the evaluation of whether appropriate safeguards exist to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant likely effects and mitigation strategies must be evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies related to the absence of defined mitigation measures, lack of detailed management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks and further confirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of the impacts on fisheries and marine life, failing to provide a reliable evaluation of both ecological and socio-economic effects. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats can be preserved or maintained without considerable disruption.

A major concern is the unwarranted assumption that fishing activities can be displaced without any repercussions. The proposal offers no proof that alternative fishing grounds are not only available but also accessible and capable of sustaining any additional pressure. This significant oversight poses a risk of overfishing in other areas and could result in broader economic repercussions for the local fishing fleet. The lack of a clear,

evidence-based assessment means the potential impacts on fisheries and livelihoods remain unclear.

Moreover, the proposal introduces significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated use of high-energy hammer piling over an extended period is likely to disrupt marine life across vast distances, affecting species such as dolphins. The potential disturbance to a considerable portion of the local bottlenose dolphin population raises substantial concerns; however, the application diminishes the importance of these effects without adequate supporting evidence.

There is a noticeable inconsistency in the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, particularly when harm is expected to such a degree that it requires legal authorisation.

Additionally, the assessment does not address cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the combination of insufficient evidence regarding fishing displacement, a downplaying of acoustic impacts, and internal inconsistencies renders the assessment both incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application regarding the project is fundamentally flawed, as it does not provide a complete assessment of onshore infrastructure. The offshore turbines are closely connected to the onshore works, yet these elements have been evaluated separately. This fragmented approach masks the true extent of the environmental and socio-economic impacts that this integrated project will have.

Key onshore components involve extensive cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access routes that traverse sensitive landscapes. Excavation activities are set to occur across deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and a

habitat of ecological importance. The lack of a thorough assessment regarding these impacts results in an incomplete understanding of the project's overall environmental footprint.

Crucially, the omission or postponement of onshore impact assessments obstructs the ability to fully evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined collectively. However, the current separation of offshore and onshore elements leaves a gap in understanding the combined effects on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are designated for protection under policy frameworks. The application fails to convincingly demonstrate that these impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential shortfall concerning biodiversity protection.

Concerns are also raised regarding the carbon balance involved in this proposal. Disturbance of peatland areas leads to the release of stored carbon, potentially resulting in a carbon debt that counters the goals of renewable energy advancement. The application inadequately addresses this critical issue or provides assurance that the overall carbon balance remains favourable.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, leading to uncertainty about the project's feasibility and lawful execution.

From a policy standpoint, the failure to assess the project as a cohesive entity and 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 inability to show that impacts can be avoided or mitigated further weakens the application.

In conclusion, the separation of project components, the absence of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts culminate in a submission that is incomplete and unreliable. This situation precludes a lawful determination of the project.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant omission within the Environmental Impact Assessment. Dark skies are a crucial aspect of the West Lewis coastline, contributing to environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that is visible over extensive distances, creating a continuous "wall of light" effect across the western horizon, which would fundamentally disrupt the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the critical importance of dark skies to the area's identity and the potential development of sectors like astro-tourism, this omission becomes even more significant. Consequently, there exists a notable deficiency in the overall landscape and environmental assessment.

Furthermore, there is a lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel demonstrate heightened sensitivity to artificial lighting due to phototaxis, which can result in disorientation and increased risk of collision. The absence of any lighting impact assessment or phototaxis study fails to address how aviation lighting may affect these species or contribute to increased mortality rates.

This lack of thorough evaluation is exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or related risks. Additionally, species like Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this has not been assessed. The failure to gather site-specific night-time data leaves a critical void in understanding ecological impacts.

Without a thorough assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt remains unmet, thereby invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The analysis of the economic and social consequences of tourism on the Isle of Lewis is seriously lacking and does not account for the essential role this sector plays in the local economy. Tourism relies heavily on the area's wild coastline, unspoilt landscapes, dark skies, and a sense of remoteness. Despite the application stating that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might impact visitor numbers, behaviour, or overall economic contribution.

Since 2017, tourism has seen substantial growth, increasing from £65 million to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not model the potential effects of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or harm an established and thriving sector.

The assessment neglects to acknowledge the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience and developing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, leading to a considerable gap in understanding the impacts on this recognised and expanding segment of the local economy.

In a community like the Isle of Lewis, which has limited economic diversification, the failure to evaluate the impacts on tourism has far-reaching implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately assessed 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 also contradicts strategic objectives that prioritise tourism as a growth sector and fails to present sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that influence visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This hampers 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 starkly fails to meet the standards for sustainable development, as evaluated against legal obligations, national policy, and evidential criteria. This application repeats fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being submitted under a more robust policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis needed for a proper assessment of the application. It lacks comprehensive baseline data, continues to employ an undefined

design envelope, depends on unspecified mitigation measures, and omits key impact pathways such as those concerning nocturnal wildlife, full onshore infrastructure, and tourism consequences. This results in an incomplete Environmental Impact Assessment, which fails to provide a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural shortcomings are evident. The failure to produce a compliant Island Communities Impact Assessment is a violation of statutory duties under the Islands (Scotland) Act 2018, while not disclosing the complete Social Impact Assessment amounts to a significant omission. Such shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for a lawful determination.

The proposal directly contravenes the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit owing to the lack of tourism impact assessments. The cumulative effects of both offshore and onshore components have not been adequately evaluated, clouding potential impacts on peatlands, carbon balance, habitats, and agricultural land.

Environmental risks associated with the project remain ambiguous and could be significantly detrimental. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The application does not meet the evidential threshold necessary to confidently conclude that adverse effects can be ruled out, thereby invoking the precautionary principle, which complicates any lawful declaration of acceptable impacts.

Furthermore, the project would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual connections, along with the repercussions for tourism, represent lasting effects that cannot be adequately mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority should refuse consent on these bases or invoke relevant regulatory provisions to obtain 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.

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: 8259E2E9

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and the accompanying documentation has revealed 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 renowned for its Atlantic-facing coastline, nearly pristine environment, and rich cultural identity. The design, scale, and proximity of the wind farm raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

One of the key issues is that the application does not present an adequate evidential basis necessary for a lawful determination. It is evident that critical environmental data is absent, and the baseline information provided is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined, which hinders the ability to assess potential impacts accurately. The reliance on a flexible design framework obscures an understanding of likely significant effects, while the unspecified mitigation measures leave their effectiveness uncertain. Consequently, the existing documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal conflicts with several policies, showcasing inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident with respect to biodiversity, natural habitats, cultural heritage, and public health and wellbeing. The application has not adequately demonstrated compliance with national obligations aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are central to the statutory tests required for consent and fundamentally undermine the competent authority's ability to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal introduces substantial concerns related to landscape capacity, visual dominance, and environmental impact, especially given the positioning of large turbines in close proximity to the shoreline. When considering the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear 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 lacks essential information, rendering it materially deficient in its account of the potential environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This flexibility introduces significant uncertainty and hinders the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, obstructing both the public and the competent authority from fully comprehending the actual environmental effects.

Additionally, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought under the premise that any environmental harm will be addressed at a subsequent stage. This approach inhibits a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and corresponding mitigations be clearly established prior to determination.

Furthermore, significant evidential deficiencies arise from gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. These issues lead to uncertainty surrounding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result of these shortcomings, the application fails to satisfy the evidential threshold mandated under the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that the impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation, and the existence of gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot appropriately determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species is significantly inadequate, failing to provide a comprehensive and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the methodologies used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for assessing impacts.

One crucial shortcoming involves otters, classified as a European Protected Species. The application neglects to appropriately recognise and evaluate their active use of coastal regions for foraging and movement. The failure to consider their core foraging ranges and behavioural patterns results in an inadequate assessment of potential impacts from construction disturbances, noise, and increased activity. This gap undermines any assertions regarding the absence of significant effects on otters.

In addition, the evaluation of basking sharks is flawed; reliance on aerial surveys leads to substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The oversight in incorporating relevant data culminates in an incomplete baseline, further weakening the reliability of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data also hampers a meaningful assessment of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment requirements and National Planning Framework 4, as it does not correctly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these conditions, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application raises significant concerns due to its inherent flaws and inconsistencies. Central to these issues is the failure to adequately demonstrate that the internationally important seabird populations on the west coast of the Isle of Lewis will not face adverse impacts. These seabird species are already

experiencing declines, and the development is situated within critical foraging areas and migratory corridors. However, the assessment lacks a thorough evaluation of potential risks such as displacement, collision, and habitat loss.

A notable contradiction arises within the application, as the developer asserts there will be no significant adverse effects while also pursuing a Habitats Regulations derogation. Such a case is typically only necessary where significant harm is anticipated, casting doubt on the reliability of the assessment. This inconsistency suggests that the conclusions drawn are not underpinned by sufficient evidence. The assessment inadequately addresses the potential effects on seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, failing to consider the critical nature of these feeding grounds. Furthermore, the reliance on modelling techniques introduces uncertainties, particularly for vulnerable species like Kittiwakes and Fulmars, with the methodologies likely underestimating mortality rates due to gaps in baseline data and limited understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional, serious risk by creating a barrier in a crucial flight path for species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential impacts on species with small global populations, have not been sufficiently assessed.

Regulatory standards necessitate a robust evidential foundation to demonstrate no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations of modelling approaches, indicates that the application does not meet the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle, hindering any lawful endorsement of the proposal. Furthermore, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural resources. The inability to conclusively demonstrate that internationally significant seabird populations will not be adversely affected places the development in contradiction with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological deficiencies, and insufficient evidence. These factors collectively impede a thorough evaluation of the impacts and affirm that the application does not fulfil 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.

CONSTRUCTION AND POLLUTION RISKS

The assessment of potential construction and pollution risks is insufficient and lacks the necessary detail to evaluate environmental effects adequately. The proposal entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be

established after consent, thus hindering any meaningful assessment of their adequacy or effectiveness.

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

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

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application fails to allow for the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated before consent, and the absence of this 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 combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings prevent a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not provide a thorough evaluation of the ecological or socio-economic impacts, failing to demonstrate that these important habitats and activities can be protected without significant disruption.

A major concern is the assumption that fishing activity can be displaced without consequences. There is no evidence presented that alternative fishing grounds are available or able to handle increased pressure. This lack of information is critical, as displacement could lead to overfishing in other areas and potentially have wider economic repercussions for the local fishing fleet. Without a clear, evidence-based

assessment, the effects on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over large distances, affecting species such as dolphins. The application downplays the predicted impact on a significant portion of the local bottlenose dolphin population, raising serious concerns without adequate supporting evidence.

Furthermore, there is an inconsistency in the application regarding the need for licences to harm European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and displacement of fishing activities. Without a comprehensive 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 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 prevent unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal represents sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline boasts exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, visible from considerable distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

The application neglects to evaluate the impacts of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is critical, given the significance of dark skies for the identity of the area and the emerging sector of astro-tourism. Such omissions create a distinct gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or lead to increased mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been investigated. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4, which pertains to the protection of natural environments and the quality of the surroundings. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time is an integral aspect of the environment.

In summary, the absence of any evaluation regarding dark skies and nocturnal wildlife represents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analyses renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The evaluation of the tourism impacts associated with this application is significantly lacking, particularly regarding the economic and social repercussions for a vital part of the Isle of Lewis economy. The local tourism industry relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the potential consequences of seascape industrialisation and environmental degradation on Tourism Gross Value Added and the resilience of the wider economy. Without this

critical analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging sectors such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding how the proposal may impact a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the neglect of tourism impact assessments poses broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly examined, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity to demonstrate net benefit. It also stands in conflict with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

Collectively, the inability to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and acknowledge the island's economic dependencies results in a significant evidential gap. This undermines a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal shows a failure to meet the requirements of sustainable development when examined against statutory duties, national policy, and evidential standards. This application repeats the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal is presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for determination in this application is incomplete and unreliable. There are significant gaps in baseline data, an undefined design envelope is being used, and reliance on unspecified mitigation measures is evident. Additionally, there is an omission of key impact pathways, including effects on nocturnal wildlife, the full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is insufficient and does not provide a clear understanding of likely significant effects or residual impacts.

Procedural failures are also present. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018,

while the failure to disclose the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from assessing impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

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

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

Considering all these issues, the application is procedurally and substantively unfit for determination. The considerable information deficiencies, combined with policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or invoke the relevant regulatory provisions to obtain the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E6D7154B

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The application is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and a strong cultural identity, as well as its near-pristine environment. A thorough review of the Environmental Impact Assessment Report and supporting documents reveals significant planning, environmental, cultural, and procedural deficiencies that cannot be overlooked.

The proposed development raises serious concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development. The application lacks an adequate evidential basis for lawful determination. Critical environmental data is absent, with baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, which obscures the potential significant effects of the development. The reliance on a flexible design framework, alongside mitigation measures that have yet to be specified, prevents an accurate assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, leaving unsupported claims regarding negligible or non-significant effects.

There are also clear and serious conflicts with established policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal presents major challenges, with large turbines situated close to the shoreline. This proximity raises significant concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and incapable of supporting a lawful determination. In this context, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to adequately assess the likely environmental effects of the proposal. It employs a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations, which introduces considerable uncertainty. This approach undermines the assessment's integrity, making it difficult for both the public and the competent authority to fully grasp the true extent of the environmental impacts, as the presented effects may not align with what will ultimately be constructed.

Additionally, the application significantly relies on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. By seeking consent on the premise that any environmental harm will be addressed at a later stage, it hinders a genuine evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the intention of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are established before any determination.

The assessment is further weakened by evidential deficiencies, such as gaps in baseline data and limitations in the methodology, coupled with an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without substantial supporting data. Without adequate information, the assessment fails to clarify cumulative and worst-case impacts, introducing a level of scientific uncertainty that conflicts with statutory obligations.

Consequently, the application does not meet the evidential standard required 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. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that suitable safeguards are in place.

Overall, the combination of relying on an undefined design envelope, the lack of specified mitigation measures, and the presence of gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and comprehensive evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. It fails to provide a complete or reliable understanding of the

ecological receptors within this area. The methodologies applied are insufficient, as they do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not offer a sound evidential basis for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application does not properly acknowledge or assess their active usage of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity. This oversight undermines any conclusions suggesting an absence of significant effects on this species.

Further weaknesses are evident in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

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

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

In summary, the deficiencies related to incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These issues impede a robust evaluation of the impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and lacks the rigorous evidence needed to support its conclusions. It overlooks the critical fact that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. The application fails to provide adequate assurance that these species will not be adversely affected, particularly given

that the development is situated within vital foraging areas and migratory pathways. The assessment does not thoroughly consider the risks of displacement, collision, or habitat loss that may arise from the project.

Moreover, there is a glaring contradiction in the application, as the developer asserts that no significant adverse effects will occur while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the credibility of the assessment and raises doubts about the validity of its findings. The evidence presented does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical feeding grounds for these birds are not adequately evaluated, and the reliance on modelling raises significant uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially where baseline data is lacking and the behavioural responses of the species are not fully understood.

The placement of turbines within a recognised migratory corridor presents an additional risk by creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations. From a regulatory standpoint, the application does not meet the necessary evidential standards to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, data gaps, and limitations in modelling all contribute to a failure to achieve the standard of beyond reasonable scientific doubt. This situation engages the precautionary principle and undermines the legal basis for granting consent.

In addition, the identified deficiencies demonstrate non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not suffer adverse effects places this proposal in direct opposition to national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. Such shortcomings impede a thorough evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is deeply flawed and overlooks the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intertwined. The application simplifies heritage to a collection of isolated, unchanging features and neglects to recognise their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is how culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are treated. These locations serve as active burial and spiritual sites, yet the assessment fails to acknowledge their continued use and significance, instead reducing them to static features. This misrepresentation leads to an inadequate understanding of cultural impacts and ignores their integral role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage such as the Gaelic language, local traditions, and the enduring relationship the community has with the coastal environment. These elements are vital to the area's identity and their exclusion signifies a considerable oversight. Without incorporating these factors, the true cultural impact of the development remains unmeasured.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population possesses a unique cultural identity that aligns with Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process conducted. This lack of genuine engagement undermines the validity of the assessment and fails to honour established principles of participation in decisions that affect cultural and environmental matters.

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 means that the responsible authority cannot meet its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This alone hinders a lawful decision.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, specifically regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy mandates.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a considerable evidential void. The cultural ramifications of the development have not been thoroughly examined, and the application fails to furnish a solid foundation for understanding the genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The submission of the application raises substantial concerns regarding the assessment of social impacts, health, and wellbeing, which is critically deficient and lacks the requisite transparency for a lawful evaluation. The developer engaged in a Social Impact Assessment, which included consultations with local residents; however, the comprehensive report remains unpublished. This absence constitutes a significant evidential gap that obstructs both public understanding and the competent authority's ability to fully grasp the social risks outlined in the developer's own research.

Existing summaries reveal that residents are currently enduring significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement and are therefore factual rather than speculative. The failure to disclose the complete assessment inhibits proper scrutiny of these findings and limits the determination of their significance within the decision-making process.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings indicating a potential for "cultural loss." Despite this acknowledgment, these detrimental impacts have not been adequately incorporated into the main application or afforded appropriate weight. The lack of access to the full Social Impact Assessment obscures the true human and social costs associated with the development.

This absence of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, especially when community character and functionality are potentially at stake. The failure to provide the complete dataset results in an application that lacks a thorough evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not satisfactorily demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and avert harm, yet the available evidence suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is unattainable.

The procedural ramifications are considerable. The competent authority is unable to perform a rigorous socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission in the application and indicates a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, combined with evidence of current adverse effects, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, exemplifies a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to this shoreline would establish a continuous industrial presence, thereby fundamentally altering the existing character and resulting in a permanent transformation of the landscape.

The application fails to adequately capture the magnitude of the anticipated visual change. The size and nearness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and undermining the defining qualities of naturalness and remoteness. Furthermore, the assessment does not convey the level of impact nor its significance regarding this sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of the visual impact has been understated, thereby compromising the assessment's reliability.

Additionally, there is a significant oversight in failing to assess the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their context and cultural significance.

The anticipated industrialisation of the seascape would disrupt these essential relationships, altering the experience of heritage assets and severing their connection to the natural horizon. This represents a visual impact alongside broader cultural and spatial harms that have not been adequately considered 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 change proposed is incompatible with the need 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 compliance.

Moreover, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inevitable. The resultant change is thus fundamental and permanent, not reducible to an acceptable level through mitigation efforts.

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interrelatedness 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 includes significant seabed preparation and installation works in a high-energy Atlantic environment. However, it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This deficiency prevents a proper evaluation of the likely environmental effects, relying instead on mitigation and contingency measures that will be prepared after consent. Such an approach does not allow for a meaningful assessment of their adequacy or effectiveness.

The West Lewis coastline, known for its clean coastal waters and important habitats, is particularly sensitive to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these issues will be prevented, controlled, or monitored.

There is 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 effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the wider assessment.

The application further lacks detailed emergency response procedures, which exacerbates these concerns. By postponing contingency planning to a post-consent phase, it hinders the evaluation of whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection measures when making a determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent, and without this information, a lawful determination cannot be made. The application also does not demonstrate compliance with policy requirements for environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with the application lacks sufficient depth, failing to provide a robust evaluation of both ecological and socio-economic impacts. The area off the West Lewis coast is home to a diverse marine ecosystem and supports an active fishing industry. However, the proposal does not adequately demonstrate the protection and maintenance of these vital uses and habitats without significant disruption.

A critical concern is the assumption made within the application regarding the displacement of fishing activity, which is presented as a feasible option without acknowledging potential consequences. There is no evidence provided to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate any increased pressure. This significant omission raises concerns about overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and the livelihoods they support remain poorly understood.

Furthermore, the proposal introduces considerable risks to marine species, especially from the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended period is likely to cause disturbances over large distances, potentially affecting species such as dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population is particularly alarming; yet, the application minimises the significance of these effects without adequate supporting evidence.

There is an evident inconsistency in the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged while simultaneously describing the impacts as negligible. This contradiction raises concerns about the credibility of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to an extent that requires legal authorisation.

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and 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 illustrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves both offshore turbines and onshore works, yet these components are assessed separately, leading to an incomplete understanding of the environmental and socio-economic impacts of what is, in reality, a single integrated project. This fragmented assessment obscures the true scale of effects and fails to capture the interconnectedness of the offshore and onshore elements.

Onshore infrastructure includes cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such works necessitate excavation through areas of deep peat, especially within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The absence of a thorough evaluation of these impacts leaves a gap in understanding the overall environmental footprint of the project.

Moreover, by excluding or delaying the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates a comprehensive consideration of all project components, yet the segregation of offshore and onshore elements fails to address the combined impacts on peatlands, habitats, and local communities effectively.

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

Concerns also arise regarding carbon balance, as disturbance of peatland may release stored carbon, thereby creating a carbon debt that contradicts the objectives associated with renewable energy development. The application inadequately addresses this issue or shows that the overall carbon balance remains beneficial.

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

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

In summary, the separation of project components, the lack of a comprehensive assessment, and insufficient evidence concerning environmental and land use impacts render this part of the application incomplete and unreliable, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a substantial flaw within the Environmental Impact Assessment. The West Lewis coastline is notable for its exceptionally dark skies, which are integral to environmental quality, cultural identity, and tourism appeal. The proposal incorporates 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, fundamentally transforming the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This omission is critical given the significance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. As a result, there exists a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of examination of impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and heighten the risk of collision. The application fails to provide a lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may affect these species or lead to increased mortality.

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

In the absence of a proper assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard required to rule out negative effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the broader ecosystem.

Collectively, the failure to assess dark skies and nocturnal wildlife presents a major evidential shortcoming. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

TOURISM

The economic impact of tourism on the Isle of Lewis is paramount, with the sector having grown 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. Given this substantial contribution, it is crucial to understand how the proposed large-scale offshore

infrastructure would affect visitor numbers, behaviour, and the overall economic contribution to the region. The application recognises that 86% of visitors are attracted by the area's scenic beauty, yet it lacks a comprehensive assessment of how the industrialisation of the seascape and a potential decline in environmental quality would impact Tourism Gross Value Added and the resilience of the local economy.

Moreover, the assessment does not adequately consider the vital role that environmental quality plays in tourism. The significance of unspoiled landscapes and dark skies is essential for enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in the understanding of impacts on a burgeoning segment of the local economy.

In addition, the failure to evaluate tourism impacts poses broader consequences for an island community characterised by limited economic diversification. This oversight has implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly addressed, in violation of the requirements set forth in the Islands (Scotland) Act 2018.

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

Overall, the lack of a quantifiable analysis of tourism impacts, the failure to consider the environmental factors influencing visitor behaviour, and the neglect of the island's economic dependency culminate in a substantial evidential gap. This deficiency precludes a thorough evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a concern. This new application is presented within a stronger policy framework that places significant emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determination is lacking, characterised by critical gaps in baseline data. The ongoing use of an undefined design envelope and reliance on unspecified mitigation measures further undermine its credibility. Additionally, important impact pathways, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism implications, have been omitted. As a result, the

Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment contravenes the statutory duty established under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

In direct contradiction to National Planning Framework 4, the proposal does not demonstrate adequate protection 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 due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks are present. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposed development would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be mitigated to an acceptable level.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2F72F2E3

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies related to planning, environmental concerns, cultural impacts, and procedural integrity. The proposed site is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched environment, and deep cultural roots. The scale and design of this project raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide a sufficient evidential foundation for a lawful decision. There are critical gaps in environmental data, while baseline information is both limited and inconsistent, leaving essential components of the proposal inadequately defined. The flexible design framework employed hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the provided documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community implications, and claims regarding negligible or non-significant effects lack robust evidential support.

Substantial conflicts with policy are evident. The proposal appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national mandates to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly relate to the statutory criteria necessary for consent and compromise the competent authority's ability to determine the development's policy acceptability.

The magnitude of this proposal is unprecedented for the area, with large turbines situated in close proximity to the shore, raising considerable concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application fails to meet the evidential threshold required under the Habitats Regulations, which necessitates the exclusion of adverse effects beyond reasonable scientific doubt. This situation is particularly concerning regarding protected species and sensitive habitats, invoking the precautionary principle. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially the mandates associated with biodiversity protection and environmental integrity. There is no assurance that impacts have been fully assessed, nor that adequate safeguards are in place.

The Environmental Impact Assessment Report is significantly inadequate and does not offer a complete, transparent, or reliable overview of the potential environmental effects linked to the proposal. By utilising a flexible Project Design Envelope without specific commitments to turbine dimensions, layouts, or configurations, a considerable degree of uncertainty is introduced. This uncertainty hinders a consistent evaluation of a worst-case scenario and ultimately compromises the integrity of the assessment. Consequently, the impacts presented may not accurately represent the development that would actually be constructed, leaving both the public and the competent authority unable to fully grasp the true extent of environmental effects.

Additionally, there are serious evidential deficiencies within the report. These include substantial gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such shortcomings result in ambiguity surrounding the scale and significance of the impacts, especially in instances where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Moreover, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans that are not yet clearly articulated. Seeking consent on the premise that any potential environmental harm will be addressed at a future stage undermines meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which demands that significant effects and mitigation are explicitly established prior to determination.

When combined, the reliance on an undefined design envelope, the lack of specified mitigation strategies, and the notable gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These critical deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application is fundamentally flawed in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of presenting a structured and reasoned comparison of realistic alternatives based on environmental impacts, it offers merely a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the developer has not shown that locating turbines further offshore has been seriously considered, even though such a move could likely reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of this analysis undermines any claim that the proposed siting is the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been properly investigated 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 mitigation by design has not been considered, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through effective site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, thus hindering the competent authority's ability to determine whether less harmful and more suitable alternatives are available. The absence of a robust alternatives assessment raises serious doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, these shortcomings compromise adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

From a regulatory standpoint, the application does not conform to the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The introduction of uncertainty prevents the dismissal of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, lawful consent cannot be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately contributing to the conclusion that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its reliability, primarily due to internal inconsistencies and methodological shortcomings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines, yet the application does not convincingly demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are directly impacted by the proposed development, but the assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss.

There exists a fundamental contradiction within the application. The developer asserts that no significant adverse effects will occur, while simultaneously pursuing a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that its conclusions lack adequate evidential support. Furthermore, the assessment does not sufficiently account for the seabirds associated with protected sites like the Lewis Peatlands and St Kilda, and the importance of these feeding grounds remains underrepresented. The reliance on modelling approaches introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars, as the methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The siting of turbines within a recognised migratory corridor presents another considerable risk, creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. Long-term implications of sustained mortality in this corridor are not thoroughly assessed, nor are the potential effects on species with relatively small global populations considered.

Regulatory standards demand that evidence demonstrates no adverse effect on the integrity of protected sites, yet this application does not meet the necessary evidential threshold. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, prevents a lawful conclusion in support of consent and engages the precautionary principle. Additionally, these 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 insufficient evidence. These failings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape, where community, environment, language, and tradition are interwoven. However, the assessment of cultural heritage and community identity is severely lacking. It approaches heritage as isolated, unchanging assets, neglecting their dynamic social, cultural, and spiritual significance to the community.

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been made public. This lack of disclosure creates a significant evidential gap, hindering both the public and the competent authority from understanding the full extent of social risks identified by the developer's own research. Available summaries suggest that residents are already feeling stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement, not speculation. However, without access to the complete assessment, proper scrutiny of these findings is not possible, which limits the ability to evaluate their significance in the decision-making process.

There is evidence that the proposal is seen as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, these impacts have not been adequately considered in the main application. The withholding of the full Social Impact Assessment conceals the true human and social costs of the development. This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character

and functioning are at risk. Without the complete dataset, the application does not provide a comprehensive basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and avoid harm, yet the available evidence points to existing negative effects that remain undisclosed. Without the full assessment, it cannot be established that the application meets this policy.

The implications of these procedural issues are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime. In summary, the non-disclosure of the full Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This ultimately prevents a lawful determination and confirms that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts falls significantly short of accurately capturing the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed large-scale turbines positioned near the shoreline would establish an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application does not sufficiently represent the extent of the visual transformation. Given their size and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots. This would detrimentally affect visual amenity and compromise the defining characteristics of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or the most adverse scenarios, particularly concerning critical cultural heritage sites and valuable landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby undermining the assessment's reliability.

Additionally, there is a notable failure to evaluate the interconnectedness between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones, alongside other Scheduled Monuments, form part of a broader landscape intricately linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as independent entities without acknowledging their interdependence,

leading to an incomplete analysis of the impacts on their settings and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This represents not merely a visual concern but a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 regarding the protection of natural environments and historic assets. The magnitude of change is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario analysis further weakens any assertion of policy compliance.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be unavoidable and dominant. Consequently, the resulting transformation is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks associated with the proposal is significantly inadequate and lacks the necessary detail to properly assess the potential environmental impacts. The initiative entails extensive seabed preparation and installation operations in a high-energy Atlantic setting, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent has been granted, thereby obstructing any thorough assessment of their adequacy or effectiveness.

This dependency on unspecified future measures raises considerable concerns, particularly in light of the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges certain risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail regarding the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the magnitude and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application precludes an evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the ability of the competent authority to adequately 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. It is essential that significant effects and mitigation strategies be evaluated prior to granting consent; failure to provide such information renders a lawful determination unachievable. Additionally, the application does not satisfactorily demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding possible impacts culminate in a materially deficient assessment. These deficiencies hinder a rigorous evaluation of construction and pollution risks, further reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment lacks a thorough 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 as well as a thriving fishing industry. However, the application does not adequately demonstrate how these vital uses and habitats will be protected or maintained without significant disruption.

A key concern is the assumption made regarding the displacement of fishing activities without acknowledging the potential consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of handling any additional pressure. This absence of information is critical, as displacement could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and the livelihoods they support remain inadequately understood.

Moreover, there are substantial risks posed to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling over a prolonged period is expected to disturb species over considerable distances, including dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

The application reveals a glaring inconsistency; it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously characterising the anticipated impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal authorisation.

Additionally, the assessment overlooks cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive analysis of these interconnected effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes the construction of a substation near Stornoway, cabling across protected moorland, and access infrastructure through sensitive landscapes. These onshore works involve excavation in areas of deep peat, particularly within Barvas Moor, which is known to be a significant carbon store and an ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, resulting in an insufficient understanding of the project's overall environmental footprint.

The onshore and offshore components of the project are intrinsically linked; however, they have been assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects. By not assessing the onshore impacts adequately, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components together. The separation of onshore and offshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Furthermore, there are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures are in place, resulting in a clear evidential gap concerning biodiversity protection.

In addition, the disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy development. The application does not address this critical issue or show that the overall carbon balance remains advantageous.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application fails to provide evidence that the necessary consents or processes have been initiated, raising questions regarding deliverability and lawful implementation.

From a policy standpoint, the project's lack of comprehensive assessment and failure to demonstrate protection for peatlands, habitats, and land use interests conflicts 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.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The importance of maintaining dark skies is particularly relevant to the area's identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts highlights a significant gap in the overall landscape and environmental assessment.

In addition, there is a critical absence of evaluation regarding the effects 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 does not provide a lighting impact assessment or a phototaxis study, resulting in an inadequate assessment of how aviation lighting might affect these species or potentially raise mortality rates.

This omission is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated

risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning the protection of natural areas and environmental quality. It also undermines a comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall landscape.

In summary, the absence of assessments regarding dark skies and nocturnal wildlife leads to a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and unable to support a lawful determination.

TOURISM

The application does not sufficiently assess tourism impacts, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives 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 lacks a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced remarkable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality would impact Tourism Gross Value Added or the wider economic resilience. Without such analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise a well-established and growing sector.

The assessment fails to recognise the significance of environmental quality in sustaining tourism, especially regarding the value of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

Within the context of an island community that has limited economic diversification,

the neglect to assess 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 examined as mandated under the Islands (Scotland) Act 2018.

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

In sum, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency culminates 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 Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to comply with the principles of sustainable development as outlined by statutory duties and national policy. This application echoes the central concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Presenting this new proposal under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate the underlying issues.

Critical deficiencies in the evidential basis for assessment are evident. There are notable gaps in baseline data, an undefined design envelope continues to be used, and unspecified mitigation measures are relied upon. Furthermore, key impact pathways—such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism—have been overlooked. Consequently, the Environmental Impact Assessment remains incomplete, inhibiting a comprehensive understanding of potential significant effects and residual impacts.

Procedural shortcomings are also apparent. The lack of a compliant Island Communities Impact Assessment signifies a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to provide a full Social Impact Assessment constitutes a material omission that limits the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unsuitable for determination.

The proposal conflicts with National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling precludes evidence of net economic benefit. Moreover, the cumulative impacts of both offshore and onshore components have not been properly evaluated, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals lead to internal inconsistencies. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing lawful conclusions regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct the ability to reach a lawful, evidence-based decision. It is imperative that the competent authority refuses consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or utilises the relevant regulatory provisions to demand the submission of the missing information.

Additional Comments

Once again, people in cities making decisions for people living in rural areas. It is short-sighted to only see the value of the landscape in terms of its resources, rather than the quality of life and tourism infrastructure of rural areas.

Scotland is a beautiful country rich in cultural and scenic significance.

This wind farm will be a generational blot on the views and aesthetic of the islands that rely on tourism for its livelihood.

Too close to shore, too great an impact.

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: 7812BF9C

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, clear, or trustworthy account of the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty and hinders a consistent evaluation of a worst-case scenario. This lack of clarity undermines the assessment's credibility, preventing both the public and the competent authority from grasping the true scale of environmental impacts.

Furthermore, the application significantly depends on unformulated mitigation measures, monitoring strategies, and management plans. Seeking consent under the premise that environmental damage will be addressed later restricts any substantial appraisal of effectiveness or evaluation of residual impacts. This postponement of essential information to post-consent stages is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations are clearly defined prior to decision-making.

Moreover, the assessment contains notable evidential shortcomings, such as 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, particularly in instances where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that fail to meet statutory obligations.

Consequently, the application does not satisfy the evidential standards required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not adequately demonstrate compliance with National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it is unclear whether impacts have been thoroughly assessed or if suitable safeguards exist.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the deficiencies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude a lawful and rigorous evaluation of environmental effects, placing the competent authority in a position where it cannot adequately assess the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is significantly lacking, failing to offer a comprehensive or dependable understanding of ecological receptors within the West Lewis coastal environment. This region is noted for its sensitivity and biological activity, yet the baseline data remains inadequate, with the

methodologies employed not effectively capturing species presence, behaviour, and habitat utilisation. Consequently, the assessment does not establish a solid evidential basis for evaluating potential impacts.

One notable gap is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the potential effects of construction-related disturbances, noise, and increased human activity have not been sufficiently evaluated. Such omissions undermine any claims made about the absence of significant effects on this species.

Additionally, the assessment of basking sharks presents further deficiencies. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or appropriately consider this data leads to an incomplete baseline, further diminishing the credibility of the conclusions reached.

These methodological shortcomings result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders meaningful assessments of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. As a result, there is substantial uncertainty regarding the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been correctly identified or evaluated. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal presents serious flaws that critically undermine its conclusions. It is evident that the west coast of the Isle of Lewis is home to seabird populations of international significance, many of which are already experiencing decline. However, the application does not meet the necessary evidential standard to ensure that these species will not suffer adverse effects. The placement of the turbines within key foraging areas and migratory routes has not been thoroughly examined in

relation to the risks of displacement, collision, or habitat loss.

A glaring contradiction is apparent in the application. The developer asserts that there will be no significant adverse effects, yet simultaneously presents a Habitats Regulations derogation case, which is only warranted if significant harm is anticipated. This inconsistency raises doubts about the credibility of the assessment and suggests that the conclusions drawn lack appropriate evidential backing.

Moreover, the assessment fails to provide sufficient evidence that seabird species linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is inadequately acknowledged, and the reliance on modelling techniques introduces considerable uncertainty. This is particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality rates, especially where baseline data is lacking and behavioural responses have not been fully accounted for.

The location of turbines along a recognised migratory corridor poses a further significant risk, as it creates an obstruction in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, in conjunction with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and inhibits a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal contradictions, methodological flaws, and a lack of compelling evidence. These weaknesses inhibit a thorough evaluation of the potential impacts and lead to the overall conclusion that the application does not satisfy the statutory criteria essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is severely deficient, particularly in acknowledging the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of recognising the ongoing social, cultural, and spiritual roles of

heritage within the community, the application adopts a simplified perspective, treating cultural heritage as a collection of fixed, isolated assets.

A significant shortcoming is the handling of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and spaces for spiritual practice. However, the assessment erroneously categorises them as static features, neglecting their current use and significance while disregarding the potential impact of development on their surroundings. This misrepresentation leads to an incomplete analysis of cultural effects and overlooks their integration into community life.

Moreover, the assessment fails to consider intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity and are notably absent from the evaluation, indicating a significant gap in the assessment process. Without acknowledging these factors, the true cultural implications of the development remain unclear.

Further, there are critical concerns regarding community rights and the need for proper engagement. The Gaelic-speaking population, which possesses distinct cultural characteristics akin to those of Indigenous Peoples, has not been subjected to a process of Free, Prior and Informed Consent. The lack of meaningful engagement in this context undermines the credibility of the assessment and fails to adhere to established standards for participation in decisions that affect cultural and environmental interests.

A crucial procedural deficiency is the omission of a compliant Island Communities Impact Assessment, a requirement stipulated by the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic consequences for the island community. This alone renders the determination unlawful.

These shortcomings ultimately place the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The disregard for both tangible and intangible aspects of heritage, as well as the failure to recognise living cultural practices, marks a clear deviation from policy expectations.

Collectively, the neglect of living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential void. The cultural repercussions of the development have not been adequately assessed, leading to a lack of a solid foundation for understanding the true cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed introduction of large-scale

turbines in proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to reflect the scale of change or the sensitivity of the environment adequately.

The application does not sufficiently represent the magnitude of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. This significant level of impact has not been properly conveyed, especially in the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the actual visual impact has been understated, which undermines the reliability of the assessment.

An additional deficiency in the assessment is its failure to consider 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 setting, visually and spatially linked to the Atlantic horizon. Instead of acknowledging their interdependence, the assessment treats these heritage assets as isolated, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This impact is not merely visual; it represents a broader cultural and spatial harm that has not been adequately assessed. From a policy standpoint, the proposal contradicts National Planning Framework 4 in terms of protecting natural places and historic assets. The scale of the proposed changes 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 assertion of policy compliance.

Lastly, it is clear 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. This change is fundamental and permanent, incapable of reduction to an acceptable level through mitigation. Collectively, these deficiencies in the assessment prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves offshore turbines alongside significant onshore infrastructure, including cabling and a substation near Stornoway. However, the assessment of these onshore components is materially incomplete, failing to acknowledge the interconnected nature of the project. This fragmented approach obscures the overall scale of the environmental and socio-economic impacts that arise from the project.

Among the onshore elements is the cabling which crosses protected moorland, alongside access infrastructure that traverses sensitive landscapes. Excavation activities will take place in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

The failure to evaluate onshore impacts prevents a proper assessment of cumulative effects, which is essential according to the Environmental Impact Assessment process. By treating the offshore and onshore components separately, the application fails to fully account for their combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments that are under policy protection, face significant risks from the proposed project. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Moreover, the proposal raises concerns about carbon balance, as the disturbance of peatland could lead to the release of stored carbon, creating a carbon debt that contradicts the objectives of renewable energy development. This critical issue is not addressed adequately in the application, leaving uncertainty about whether the overall carbon balance remains beneficial.

The routing of infrastructure through active croft land also introduces potential conflicts with existing land use and legal rights. There is no evidence in the application that the necessary consents or processes have been initiated, which raises questions about the deliverability and lawful execution of the project.

From a policy perspective, the lack of a holistic assessment of the project, alongside failure to protect peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which represents a significant omission. The coastline of West Lewis is known for its exceptionally dark skies, an essential aspect of its environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

There is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to address these factors highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the impacts of this lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. Without a dedicated lighting impact assessment or phototaxis study, the application does not assess how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

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

Without a thorough assessment of nocturnal impacts, it remains unclear whether protected species or designated sites may face adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In summary, the absence of any assessment regarding 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 unable to support a lawful determination.

TOURISM

The Isle of Lewis economy is heavily reliant on tourism, which has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the assessment of tourism impacts in the application is materially deficient, failing to evaluate the economic and social consequences for this key sector. Although the application acknowledges that 86% of visitors are attracted by the area's scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure could impact visitor numbers, behaviour, or overall economic contribution.

The industrialisation of the seascape and potential loss of environmental quality are not modelled in terms of their effects on Tourism Gross Value Added or the wider economic resilience of the island. Without such an analysis, it is impossible to ascertain whether the development would yield a net economic benefit or threaten an established and growing sector. The assessment further neglects to consider the role of environmental quality, particularly the significance of unspoiled landscapes and dark skies to visitor experience, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on a crucial and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the omission of tourism impact assessments carries broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4, particularly regarding economic impact and the necessity of showing net benefit. It conflicts with strategic objectives that recognise tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

The cumulative effect of the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency results in a significant evidential gap. This inadequacy hinders a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. This proposal echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now presented under a more robust policy framework, which places increased importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis necessary for a proper assessment. The application relies on an undefined design envelope and lacks clarity on specified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism effects, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, inhibiting a thorough understanding of likely significant effects or residual impacts.

Additionally, the proposal suffers from clear procedural inadequacies. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a substantial omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

It is also in direct contradiction to National Planning Framework 4, as it does not adequately protect biodiversity, natural places, or cultural heritage. The proposal fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently evaluated, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold required to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

We need green energy production in the UK but we do not need N4 which will come with a long list of negatives that far outweigh the positives. Right from the start this has been a bad development and the license should never have been allowed to develop this location. Being so close to shore it is not really an 'off-shore windfarm' it is an 'in-shore windfarm' and comes with the negatives of both off shore and on shore developments.

Environment: I am seriously concerned about the potential impacts of this development on the environment. The West side of Lewis is important for a range of bird species both marine and terrestrial and this development creates collision risks, breeding bird displacement and migrating bird displacement. Data collection has been terrible with survey methods inadequate to measure the real use of this area - DAS has been used as allowed HOWEVER, this method is unable to survey in anything more than a stiff breeze, as a avid nature watcher who spends many hours watching the seas in this area the conditions when large numbers of birds are seen passing the proposed array area are stronger onshore winds. Data collection is fundamentally flawed and the results are not even close to representative. There are also species (European storm-petrel, leach's storm petrel as examples) that are far more prevalent during the night - some good evidence for this is the number of these species that are ringing from shore during night (can be hundreds at single locations in a few hours), many species are also nocturnal migrants - there has been no data collection specifically looking at nocturnal species a huge data gap! There has also been no attempt to factor in major stochastic events that we see most autumns for shearwaters, at some points over 2000 sooty or Manx shearwater can be seen to move through the array area EVERY HOUR, I provided these observation which have been dismissed - yet another large data gap. Flight height data has also been poorly used and known uncertainties within this data ignored when it benefits the developer - for example they state many times that certain species flight height will not put them in risk of collision, however these data are based on low wind boat based observations which state flight heights could be higher in stronger winds this last bit is conveniently ignored. I have similar concerns about lack of data collection of migratory species some of which are under serious threat e.g. Greenland white-fronted geese. Some species have not been included in the assessment such as White-tailed eagle which are observed to hunt in the array area - the reason given for this is that four white-tailed eagle chicks tagged on Lewis did not track through the array area so it will be low risk?? There is no detail on where these four chicks were tagged (they could have been East side birds), there is no acknowledgement that feeding behaviours of young and adults is very different, with young being more reliant on scavenging and adults more hunters, again they have used cherry picked information to back their case without any real basis - yet again very poor data being used in the assessment. Links to Lewis Peatland SPA have been underplayed with little acknowledgement regarding red-throated diver impacts and corncrake impacts - these species will be impacted by both marine and terrestrial elements of this development and must be considered in the whole, drawing any conclusions based on the marine elements for species that also use the terrestrial environment is not the full picture and ignorant at best and misleading at worst.

Dark skies - the dark skies of Lewis are some of the worlds best. The dark skies of Lewis are hugely important to nature here, as well as local people and a significant draw for

tourists. N4 will destroy these dark skies, eroding culture, reducing wellbeing of residents, reducing the health of the environment of wildlife and making the area less attractive for tourists (an important and growing industry on Lewis). The jobs N4 would bring would not off-set the jobs impacted by its presence - Northland Power talk about local job creation but I actually think it could lead to overall job losses.

I live and work on the Isle of Lewis and its wild coasts are such an important part of the island. We live with windfarms and more are on their way. No all are bad but this one is. It will reduce my families standard of living, it will change our home and there are still no final details or any evidence to show how the Community would benefit in the rush to get this planning granted. Over 50% of the Outer Hebrides is Community owned, a large private development such as this goes against how Lewi operates and threatens to prevent Community windfarms getting access to the grid. Everywhere you look there are examples of how N4 will be bad for Lewis.

In all this proposed development has been poorly thought through. Will not bring any benefits to the Isle of Lewis and will bring many impacts. I urge that this application is refused and more suitable green energy developments are granted.

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: 4256ADE5

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 thorough review of the Environmental Impact Assessment Report and accompanying documentation has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the project raise serious concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a robust 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. Furthermore, several key components of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures renders any evaluation of their effectiveness impossible. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack adequate support from reliable evidence.

There are evident and serious 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 landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate that national mandates to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts are critical to the statutory tests required for consent and undermine the competent authority's ability to determine that the development meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines situated alarmingly close to the shoreline, which introduces substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unfit to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable overview of the potential environmental effects linked to the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to definitive turbine sizes, layouts, or configurations, creates considerable uncertainty. This ambiguity compromises the integrity of the assessment, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are unable to grasp the true magnitude of the environmental effects.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions suggests that any environmental harm will be resolved at a later stage, which obstructs a meaningful evaluation of effectiveness and an assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation measures must be clearly identified prior to determination.

Moreover, the application reveals substantial evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These factors lead to uncertainty surrounding the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. The proposal also fails to demonstrate adherence to the National Planning Framework 4, including its stipulations regarding biodiversity protection and environmental integrity, as it is not evident that the impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a significant shortcoming in relation to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a clear comparison of realistic alternatives based on their environmental impacts, it presents a narrative account of project evolution. This narrative does not adequately demonstrate

that less harmful options have been identified, assessed, and selected over more damaging solutions.

Moreover, there is no transparent evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, which could potentially mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact further highlight the need for such an analysis. Without it, there can be no conclusion that the proposed siting is the least damaging option available.

The inadequacies also extend to cable routing and landfall assessments, where there is a lack of sufficient evidence demonstrating that alternative routes have been explored to avoid or minimise impacts on sensitive receptors. This includes consideration of areas with cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, leading to an over-reliance on post-design mitigation measures.

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

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This area is notably sensitive and biologically active; however, the baseline data provided is incomplete, and the methodologies utilised fail to capture the presence, behaviour, and habitat use of various species. Consequently, the evidential basis for evaluating potential impacts is inadequate.

Specifically, there is a critical oversight regarding otters, a species protected under European law, as the application does not adequately recognise or assess their active foraging and movement in coastal areas. The assessment neglects to consider their core foraging range and behavioural patterns, thereby failing to properly evaluate the potential effects of disturbances caused by construction, noise, and increased activity.

This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Further shortcomings exist in the assessment of basking sharks, where the reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence, especially when contrasted with established land-based observations indicating their frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that assertions of negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including those arising from seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not conform to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus 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 fundamentally unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

There is a fundamental contradiction within the application, as the developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency undermines the reliability of the assessment and highlights the lack of support for its conclusions based on the available evidence.

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

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

From a regulatory viewpoint, the application does not fulfil the evidential threshold needed to confirm no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, which prohibits a lawful conclusion in support of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape wherein environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static features rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the handling of sites with cultural importance, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment inaccurately categorises them as static elements. This failure to acknowledge their continued use, significance, and the potential impacts of development on their context leads to an incomplete understanding of cultural effects and ignores their integral role in community life.

The assessment further neglects the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity yet are entirely omitted from the evaluation, resulting in a significant gap. Without addressing these aspects, a comprehensive understanding of the cultural impact of the proposed development is unattainable.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, which embodies a unique cultural identity characteristic of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful involvement undermines the credibility of the assessment and fails to adhere to established principles of participatory decision-making related to cultural and environmental interests.

A critical procedural oversight is the failure to complete a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to scrutinise the social, cultural, and economic effects on the island community. This omission is significant and precludes a lawful determination of the application.

From a policy standpoint, these deficiencies create a direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear departure from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and statutory requirements results in a considerable evidential void. The cultural impacts of the proposed development have not been adequately assessed, rendering the application insufficient for ascertaining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the absence of the complete report creates a substantial evidential gap. This omission hinders both public understanding and the competent authority's ability to assess the full scope of social risks identified in the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern due to the size and proximity of the proposed development. These reactions stem from direct engagement with the community and are therefore rooted in reality, not speculation. However, without access to the full assessment, proper scrutiny of these findings is impossible, which limits the assessment of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal poses a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite these identified impacts, they have not been adequately reflected in the application nor given appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs of the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for projects of this magnitude, especially when community character and function may be at stake. By not presenting the complete dataset, the application lacks a solid evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not comply with the National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm, yet the evidence available points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural implications are profound. The competent authority cannot perform a comprehensive socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, along with the evidence of current adverse impacts, makes the assessment incomplete and unreliable. This prevents a lawful determination and highlights that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines close to the shoreline represents a significant threat to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. Such an industrial presence would create a continuous and dominant alteration to the landscape, leading to a permanent and irreversible transformation that undermines its character.

The application lacks a proper representation of the scale of the visual change that would occur. The height and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment fails to accurately reflect the level of impact and its significance within this sensitive landscape.

There are serious methodological issues regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of the visual impact has been understated, undermining the reliability of the overall assessment.

Moreover, the assessment does not adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked to the Atlantic horizon through visual and spatial connections. Treating these sites as isolated entities disregards their interdependence and leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and affecting their link to the natural horizon. This results not only in visual impacts but also in broader cultural and spatial harm that the application fails to assess adequately.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is not compatible 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 seriously undermines 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 resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

Overall, the assessment fails to adequately represent the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and highlight that the proposal is incompatible with the protection of this invaluable landscape.

CONSTRUCTION AND POLLUTION RISKS

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

Particularly alarming is this reliance on undefined future measures, especially given the

sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient detail on the prevention, control, or monitoring of these risks.

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, determining the extent, duration, or ecological effects of these impacts is impossible. This uncertainty also extends to the potential effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders the evaluation of whether suitable safeguards are in place to respond to pollution incidents. This approach introduces procedural risk and compromises the capacity 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 of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; the absence of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts render the assessment materially deficient. These deficiencies inhibit a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support a vital fishing industry. However, the proposal does not adequately demonstrate that these crucial uses and habitats can be preserved without significant disruption.

One major concern is the flawed assumption that fishing activities can be shifted without repercussions. The application lacks evidence showing that alternative fishing grounds are not only available but also accessible and capable of handling increased pressure. This significant omission raises alarm, as displacing fishing activities threatens to lead to overfishing in other areas, potentially resulting in detrimental economic impacts on the local fleet. Without a detailed and evidence-based analysis, the consequences for fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses 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 likely to create disturbances over vast distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate supporting evidence.

There is a significant inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where potential harm is expected to necessitate legal authorisation.

Moreover, the assessment does not address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and fishing activity displacement. 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 fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the proposal qualifies as sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines and onshore works are linked but assessed separately, leading to a fragmented view of the environmental and socio-economic effects.

The onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities include excavation in areas of deep peat, especially within Barvas Moor, which is important for carbon storage and biodiversity. The application fails to provide a thorough assessment of these impacts, which hinders understanding of the project's environmental footprint.

Excluding or postponing the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process

requires that all parts of a project be considered together, but separating offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully recognised.

There are significant risks to sensitive habitats, such as machair systems and peatland areas, which are under policy protection. The application does not show that it has fully assessed impacts on these habitats or that it has implemented appropriate avoidance measures, creating a notable gap in biodiversity protection.

The proposal also raises issues concerning carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy goals. This issue is not adequately addressed in the application, which fails to demonstrate a beneficial overall carbon balance.

Moreover, routing infrastructure through active croft land may conflict with existing land use and legal rights. There is no evidence that necessary consents or processes have been initiated, which raises concerns about the deliverability and legality of the project.

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

Overall, the separation of project components, the absence of a comprehensive assessment, and insufficient evidence on environmental and land use impacts make this part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies constitutes a serious gap in the Environmental Impact Assessment. The proposal is situated along the West Lewis coastline, an area known for its exceptionally dark skies that are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will create a continuous “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Significantly, the application does not evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly noteworthy given that dark skies are vital to the area's identity and to emerging sectors such as astro-tourism. As a result, the failure to consider these impacts leads to a clear shortfall in the overall landscape and environmental evaluation.

Moreover, there is no examination of how the lighting may affect nocturnal wildlife, including sensitive species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are particularly vulnerable to artificial lighting due

to their phototaxis, which can result in disorientation and an increased risk of collision. The application lacks any lighting impact assessment or phototaxis study, meaning it does not assess the potential effects of aviation lighting on these species or their mortality rates.

This gap is further exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and related risks. Species such as Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial light, yet this has not been evaluated. The absence of night-time specific data leads to a critical shortfall in understanding ecological consequences.

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

From a policy standpoint, the omissions in the assessment contravene the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. This also detracts from the comprehensive evaluation of landscape and seascape impacts, since the character of night-time environments is an essential aspect of the overall setting.

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

TOURISM

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

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Nevertheless, the application neglects to model how the industrialisation of the seascape and the potential loss of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this crucial analysis, it remains unclear whether the proposed development would result in a net economic benefit or jeopardise a crucial

and expanding sector.

Moreover, the assessment fails to acknowledge the significance of environmental quality in underpinning tourism, including the critical role that unspoiled landscapes and dark skies play in shaping visitor experiences and the growth of niche markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a notable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

Given that the island community has limited economic diversification, the inadequate assessment of 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 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 necessity to establish a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to supply adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the economic dependence of the island culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and underscores the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to adhere to the principles of sustainable development as required by statutory obligations, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis provided for this application. Critical gaps exist in baseline data, and the use of an undefined design envelope raises concerns. The application relies on unspecified mitigation measures and fails to account for significant impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as per the

Islands (Scotland) Act 2018. Furthermore, the failure to present a complete Social Impact Assessment is a notable omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4. It fails to provide assurances for the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore elements remain improperly assessed, which obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

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: F39A3351

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

Dear Sir/Madam

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

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks material completeness and does not deliver a transparent or reliable account of the expected environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates considerable uncertainty. This situation hinders the consistent application of a worst-case scenario analysis. Consequently, the integrity of the assessment is compromised, meaning that the impacts presented may not accurately reflect the development that will ultimately be constructed. This deficiency obstructs both public and competent authority understanding of the true extent of the environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that environmental harm will be addressed later, which hampers a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly established before any determination.

Additional evidential deficiencies are apparent, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obscures a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory requirements.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to offer a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet it suffers from incomplete baseline data and methodologies that do not effectively capture species

presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating impacts.

A significant gap exists concerning otters, which are a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal areas for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been properly evaluated. Such shortcomings undermine any conclusions drawn about the absence of significant effects on this species.

There are also notable deficiencies in the evaluation of basking sharks. The use of aerial surveys creates a significant detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This issue is further highlighted when compared to established land-based observations that indicate frequent use of these waters. The failure to integrate or adequately consider such data results in an incomplete baseline, which further weakens the reliability of the conclusions made.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. It adopts a simplistic view of heritage, treating it as a collection of isolated, static features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community. This reductive approach undermines the true nature of these assets.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated inadequately. These sites remain active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects

their continued use and meaning, failing to consider how development impacts their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Moreover, the application neglects to assess intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These vital elements form the identity of the area but are absent from the assessment, highlighting a significant omission. Without addressing these factors, the cultural impact of the proposed development cannot be fully understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity with characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to align with established principles of participation regarding cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to meet its legal obligations in evaluating the social, cultural, and economic impacts on the island community. The lack of this assessment alone hinders a lawful determination.

From a policy standpoint, these deficiencies create a direct conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to recognise living cultural practices illustrates a clear departure from policy requirements.

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a complete and transparent assessment of social impacts, health, and wellbeing, which is crucial for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This creates a significant evidential gap, hindering the public and the competent authority from grasping the full extent of the social risks identified through the developer's own research.

Residents are reportedly facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These effects are based on direct engagement and are thus not speculative. Nonetheless, the failure

to disclose the full assessment limits proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's own findings highlighting the risk of "cultural loss." Despite acknowledging these impacts, they have not been sufficiently integrated into the main application or given the necessary weight. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning may be compromised. By failing to provide the complete dataset, the application does not offer an adequate evidential foundation 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. Developments must promote positive health outcomes and mitigate harm, yet the existing evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a material flaw in the application and indicates a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This obstructs a lawful determination and underscores that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines near the West Lewis coastline presents significant deficiencies in its assessment of seascape, landscape, and visual impacts. The open Atlantic horizon, undeveloped character, and strong remoteness of this area are fundamental aspects that would be irreversibly altered by the introduction of an industrial presence. The application fails to accurately reflect the magnitude of the visual change that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby eroding the naturalness and remoteness that currently define this landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. There is evidence that these viewpoints may not adequately capture the

perspectives of the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the assessment underestimates the magnitude of visual impact, compromising its overall reliability.

Moreover, the interconnectedness between landscape, seascape, and cultural heritage has not been properly assessed. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that connects visually and spatially to the Atlantic horizon. The assessment treats these sites in isolation, failing to acknowledge their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertion of compliance with relevant policies.

Ultimately, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Thus, the changes to the landscape are fundamental and permanent, rather than something that can be lessened to an acceptable level through mitigation.

In summary, the assessment fails to convey the true scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These shortcomings preclude a reliable evaluation and firmly establish that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks related to the proposal is severely lacking in detail, which hinders a proper assessment of its likely environmental impacts. Significant seabed preparation and installation are planned within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is notable. Instead, the application relies on mitigation and contingency measures that are to be created after consent is granted, limiting any meaningful assessment of their sufficiency or effectiveness beforehand.

This reliance on unspecified future measures is particularly alarming, considering the

sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate details on how these risks will be prevented, managed, or monitored.

There is significant uncertainty regarding the size and behaviour of sediment plumes that might result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application removes the opportunity to evaluate whether adequate measures are in place to address pollution events, thus introducing procedural risk. This situation undermines the competent authority's ability to assess the environmental protection measures effectively at the point of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are assessed before consent can be granted. The application does not adequately demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainties surrounding potential impacts all contribute to a materially inadequate assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic effects. The coastal waters of West Lewis are home to a rich marine ecosystem and an active fishing industry, yet the application does not sufficiently demonstrate that these habitats and uses can be protected or sustained without major disruption.

One of the critical concerns is the assumption that fishing activities can be displaced without significant repercussions. The application lacks evidence that there are alternative fishing grounds which are accessible and can handle additional fishing pressure. This gap is particularly important, as the potential for displacement could lead to overfishing in other areas, with broader economic implications for the local fishing fleet. Without a comprehensive and evidence-based analysis, the impacts on

fisheries and the livelihoods that depend on them remain unclear.

Furthermore, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over extended periods is expected to cause disturbances across large distances, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns; however, the application downplays these effects without providing adequate supporting evidence.

There exists an apparent contradiction within the application, where the necessity for licenses to allow harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal approval.

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

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

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

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 lighting will fundamentally change the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are a vital aspect of environmental quality, cultural identity, and tourism value in the area.

The application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This is a significant oversight, especially considering the increasing importance of dark skies to the region's identity and the growth of tourism sectors like astro-tourism. The failure to assess these impacts represents a clear gap in the overall landscape and environmental evaluation.

Furthermore, there is no consideration of how the proposed lighting will affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and raise the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may influence these species or contribute to increased mortality rates.

This issue is aggravated by the reliance on daytime survey data for the ornithological assessment, which fails to account for nocturnal activities or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this concern has not been examined. The lack of site-specific night-time data results in a critical deficit in understanding the ecological impacts.

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

From a policy standpoint, these omissions contradict the National Planning Framework 4 regarding the protection of natural areas and environmental quality. They also weaken the overall evaluation of landscape and seascape impacts, as the night-time character is a crucial element of the environment.

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

TOURISM

The assessment of tourism impacts presents significant deficiencies and does not adequately consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Given the reliance of tourism on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness, this oversight is particularly concerning. The application states that 86% of visitors are attracted by scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the proposal does not model the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or broader economic resilience. Without such an analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects the significance of environmental quality for tourism, especially the value of unspoiled landscapes and dark skies to visitor experiences, including growing markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this gap, leaving a considerable lack of understanding regarding impacts on an acknowledged and burgeoning segment of the local economy.

In the context of a community on an island with limited economic diversification, the lack of assessment regarding tourism impacts 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 adequately evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly concerning economic impact and the requirement to show a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector and fails to supply sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors driving visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This ultimately hinders a robust assessment of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined 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 really fail to understand why anyone would consider this proposal to totally reshape such a beautiful island, and the quality of life for the wonderful people who live there, an acceptable way to proceed.

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: 05BB918B

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 presents significant deficiencies that compromise its reliability and transparency regarding the potential environmental impacts of the proposal. Central to this issue is the use of a flexible Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations for the turbines. This introduces a level of uncertainty that hinders the consistent application of a worst-case scenario, ultimately undermining the assessment's integrity. As a result, the documented impacts may not accurately represent what will be constructed, thereby preventing both the public and the competent authority from grasping the true extent of the environmental effects.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under such conditions implies that environmental harm will be addressed later, which obstructs any meaningful evaluation of effectiveness and assessment of residual impacts. This approach to deferring key information until post-consent stages is not only procedurally unacceptable but also contradicts the fundamental purpose of the Environmental Impact Assessment regime. This regime necessitates the clear establishment of likely significant effects and mitigation prior to determination.

There are also notable gaps in evidence, including missing baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainties about the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without adequate supporting data. The lack of comprehensive information further obscures the understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold required by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be proven that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specific mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report incomplete and unreliable. These shortcomings hinder a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a determination based on the information that has been provided.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic alternatives based on environmental effects, it merely provides a narrative account of project evolution. This method does not

convincingly show that less harmful options have been properly identified or selected over more damaging ones.

There is a notable lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Specifically, the application does not indicate that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely be lessened. The sensitive nature of the West Lewis coastline and the critical importance of proximity to shore in assessing impact underscore the necessity for such analysis, which is notably absent. This omission prevents any conclusion that the proposed siting is indeed the least damaging option.

The shortcomings also affect cable routing and landfall assessment, with insufficient evidence demonstrating that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been applied, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not adequately show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy raises concerns regarding compliance with National Planning Framework 4, particularly in protecting natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment pertaining to marine ecology and protected species is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors present in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet there exists a deficiency in the baseline data, and the methodologies employed inadequately address species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Significantly, the assessment does not adequately acknowledge or evaluate the presence of otters, which are classified as a European Protected Species. There is a failure to recognise their active utilisation of coastal regions for foraging and movement. This oversight, particularly concerning their core foraging range and

behavioural patterns, results in a lack of thorough analysis regarding the potential impacts of construction activities, noise, and increased human presence, thereby undermining any claims of negligible effects on this species.

Moreover, the evaluation of basking sharks is similarly deficient, primarily due to the heavy reliance on aerial surveys that introduce notable detection bias, especially under Atlantic conditions. This methodological choice is likely to lead to an underestimation of the species' presence, especially when compared to established land-based observations that indicate frequent usage of the waters in question. The failure to adequately incorporate or consider such data further compounds the inadequacies in the baseline assessment and diminishes the credibility of the conclusions reached.

These methodological shortcomings result in conclusions regarding negligible or non-significant effects being based on assumptions rather than on solid evidence. Additionally, the lack of adequate baseline data obstructs a meaningful analysis of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations outlined in 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 thereby prevents the exclusion of adverse effects beyond reasonable scientific doubt, 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, inadequate methodologies, and unsubstantiated conclusions culminates in an unreliable assessment. These deficiencies inhibit a rigorous evaluation of impacts on marine ecology and protected species, culminating in the overall assertion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application does not satisfy the evidential threshold required to demonstrate no adverse effect on the integrity of protected sites. There are significant gaps in evidence, internal inconsistencies, and methodological weaknesses that undermine the reliability of the ornithological assessment. The assessment fails to adequately evaluate the implications of displacement, collision risk, and habitat loss for internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline. The application suggests that no significant adverse effects are anticipated, yet it simultaneously puts forward a Habitats Regulations derogation case, which implies that significant harm is expected. This contradiction raises serious concerns about the validity of the assessment's conclusions.

Furthermore, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will not be

adversely impacted. The significance of these feeding grounds is not fully considered, and the reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are experiencing severe declines. The methodologies used are likely to underestimate potential mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

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

Collectively, these deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. The overall conclusion is that the assessment is unreliable due to its internal inconsistencies and insufficient evidence, which prevents a thorough evaluation of impacts and indicates that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. Instead of appreciating heritage as an evolving entity with ongoing social, cultural, and spiritual significance, the application adopts a simplistic view that treats it as a collection of isolated, static assets.

There is a critical shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These sites are active areas for burial and spiritual observance, yet the assessment overlooks their current use, meaning, and the potential impacts of development on their environment. This misrepresentation leads to an incomplete understanding of cultural implications, neglecting their integral role in community life.

Moreover, the assessment fails to address intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing relationship the community has with the coastal environment. These components are essential to the area's identity but are conspicuously absent from the evaluation, resulting in a significant gap. Without acknowledging these factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population embodies a unique cultural identity characteristic of Indigenous Peoples; however, there has been no process for Free, Prior and Informed Consent. This lack of

meaningful engagement compromises the assessment's validity and disregards established principles of community involvement in matters affecting cultural and environmental interests.

Compounding these issues is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without such an assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is a significant barrier to lawful decision-making.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly diverges from established policy requirements.

Ultimately, the absence of a thorough evaluation of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential void. The cultural ramifications of the proposed development have not been adequately assessed, and the application fails to deliver a solid foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks transparency and depth in assessing social impacts, health, and wellbeing, which is critical for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence signifies a notable evidential gap, hindering both public insight and the competent authority's understanding of the social risks identified in the developer's own research.

Summaries suggest that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct community engagement and are not speculative in nature. However, without access to the complete assessment, there is limited capacity for proper scrutiny of these findings, which in turn restricts the evaluation of their significance in the decision-making process.

Furthermore, there is clear evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these impacts have not been thoroughly integrated into the main application, nor have they received the weight they warrant. The failure to disclose the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and

functionality are at stake. By withholding the full dataset, the application does not provide a complete evidential basis necessary for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm, yet the evidence at hand reveals adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be validated.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a significant omission in the application and a failure to fulfil 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 effects, renders the assessment inadequate and unreliable. This situation obstructs a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

There are serious methodological concerns regarding how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This raises the risk that the assessment has understated the magnitude of visual impact, undermining its reliability.

Additionally, the assessment fails to consider the interconnected relationship between landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader

landscape setting tied together by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets rather than recognising their interdependence results in an incomplete evaluation of their cultural significance and the impacts on their setting.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment significantly undermines any claim of policy compliance.

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

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

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

A major concern lies in the assumption that fishing activities can be displaced without repercussions. There is a lack of evidence within the application regarding the availability, accessibility, or suitability of alternative fishing grounds to accommodate this displacement. This crucial omission poses risks of overfishing in other areas, which may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to fully grasp the impacts on fisheries and livelihoods.

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

There exists a contradiction within the application itself, where the necessity of

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with this project is significantly deficient and does not adequately consider the comprehensive impacts of what constitutes a single integrated project. The offshore turbines and the onshore works are inherently interconnected, yet they are evaluated independently. This fragmented assessment obscures the true magnitude of environmental and socio-economic consequences.

Onshore elements encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a critical carbon store and ecologically sensitive environment. The application lacks a thorough assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs an appropriate analysis of cumulative effects. The Environmental Impact Assessment process stipulates that all components of a project must be considered collectively. However, the disconnection between offshore and onshore elements results in a failure to fully grasp the combined effects on peatlands, habitats, and local communities.

There are also notable risks to vulnerable habitats, including machair systems and peatland environments that are subject to policy protections. The application does not

substantiate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap in relation to biodiversity conservation.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that is at odds with the goals of renewable energy development. The application fails to sufficiently address this matter or to demonstrate that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land presents potential conflicts with established land use and legal rights. The application does not provide adequate evidence that the requisite consents or procedures have been initiated, which raises serious concerns regarding the feasibility and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and nocturnal wildlife is completely missing from the Environmental Impact Assessment, creating a significant omission. The proposed development introduces permanent red aviation lighting, which would be visible over long distances and create an intrusive "wall of light" effect along the western horizon. This would fundamentally alter the night-time environment.

Moreover, there has been no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is alarming, especially given the importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to address these impacts leads to a substantial gap in the overall assessment of landscape and environmental effects.

Even more concerning is the absence of an evaluation of impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a higher risk of collision. The application lacks any lighting impact assessment or

phototaxis study, failing to evaluate how the aviation lighting might affect these species or contribute to increased mortality rates.

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

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard required to rule out negative effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and hindering lawful decision-making.

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 broader evaluation of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

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

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to 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. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure 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 comprising up to 16% of the island's economy. Nonetheless, the application does not model the potential impacts of the industrialisation of the seascape and the consequent loss of environmental quality on Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would yield a net economic benefit or detract from a well-established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies to visitor experiences and the burgeoning markets of nature-based tourism and astro-

tourism. The omission of a Dark Skies Assessment exacerbates this deficiency, leaving a considerable gap in the understanding of impacts on a recognised and growing part of the local economy.

In an island community characterised by limited economic diversification, the lack of consideration for tourism impacts carries broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the requisite to demonstrate net benefit. It conflicts with strategic objectives identifying tourism as a priority growth sector and does not furnish sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This undermines the ability to conduct a rigorous evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory obligations, national policies, and evidential standards. It echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. This current application is presented under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of local communities.

There are substantial deficiencies in the evidential basis for the proposal, including critical gaps in baseline data and the utilisation of an undefined design envelope. The application relies on unspecified mitigation measures and fails to consider essential impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering the ability to fully comprehend likely significant effects or residual impacts.

Furthermore, the application contains notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contravenes the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Additionally, there is a failure to establish a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making a lawful conclusion regarding acceptable impacts unattainable.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs the possibility of a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or exercise the relevant regulatory powers to demand the missing information.

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

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: A610ECBD

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

Dear Sir/Madam

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

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

The proposal presents clear and substantial conflicts with policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These policy conflicts directly affect the statutory tests required for consent and weaken the ability of the competent authority to determine that the development is acceptable from a policy perspective.

The unprecedented scale of the proposal in this location, with large turbines placed in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application seeks consent based on an Environmental Impact Assessment Report that is materially deficient, lacking a full, transparent, and reliable account of the likely environmental effects associated with the proposal. A significant concern is the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and undermines the integrity of the assessment, preventing the consistent application of a worst-case scenario. As a result, the impacts presented may not accurately reflect what will ultimately be constructed, hindering both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed subsequently prevents any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established prior to determination.

The report also exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty regarding the scale and significance of impacts, particularly in cases where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application fails to meet the evidential threshold required under the Habitats Regulations, as it cannot exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and robust assessment of environmental effects, meaning that the competent authority cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fraught with significant deficiencies, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically active marine system, yet the baseline data provided is insufficient. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of the species within this ecosystem. As a consequence, the assessment does not furnish a credible evidential basis for evaluating potential impacts.

A critical oversight involves otters, which are classified as a European Protected Species. The application neglects to appropriately recognise and assess their active utilisation of coastal areas for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such shortcomings undermine any assertions regarding the absence of significant effects on this species.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider this data results in a deficient baseline, thereby weakening the reliability of the conclusions presented.

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

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

Ultimately, the amalgamation of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies impede a thorough evaluation of impacts on marine ecology and protected species, contributing to the overarching conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The ornithological assessment associated with the development application is materially flawed and fails to demonstrate to the required evidential standard that these species will not be adversely affected. The application does not adequately evaluate key foraging areas and migratory pathways, neglecting to consider the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction within the application arises as the developer concludes that there are no significant adverse effects, while simultaneously presenting a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency raises concerns regarding the reliability of the assessment, indicating that the conclusions drawn are unsupported by the underlying evidence. The assessment lacks sufficient evidence to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and does not fully account for the importance of these feeding grounds. Moreover, the reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses remain inadequately understood.

The siting of turbines within a recognised migratory corridor presents an additional and significant risk, effectively creating a barrier in 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 or the potential effects on species with relatively small global populations.

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

These deficiencies also indicate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, which impede a robust evaluation of impacts and support the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape wherein

environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static features rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the handling of sites with cultural importance, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment inaccurately categorises them as static elements. This failure to acknowledge their continued use, significance, and the potential impacts of development on their context leads to an incomplete understanding of cultural effects and ignores their integral role in community life.

The assessment further neglects the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity yet are entirely omitted from the evaluation, resulting in a significant gap. Without addressing these aspects, a comprehensive understanding of the cultural impact of the proposed development is unattainable.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, which embodies a unique cultural identity characteristic of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful involvement undermines the credibility of the assessment and fails to adhere to established principles of participatory decision-making related to cultural and environmental interests.

A critical procedural oversight is the failure to complete a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to scrutinise the social, cultural, and economic effects on the island community. This omission is significant and precludes a lawful determination of the application.

From a policy standpoint, these deficiencies create a direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear departure from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and statutory requirements results in a considerable evidential void. The cultural impacts of the proposed development have not been adequately assessed, rendering the application insufficient for ascertaining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment is concerning and raises immediate questions about the validity of the proposal. Despite the developer

conducting focus groups with local residents, the complete report has not been published. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to fully grasp the social risks highlighted by the developer's own research.

Summaries that are available reveal that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These findings stem from direct engagement with the community and are not mere speculation. However, without access to the full assessment, it is impossible to scrutinise these findings adequately or to appreciate their significance in the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not sufficiently capture the extent of change or the sensitivity of the environment

involved. The character of the West Lewis coastline is shaped by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish an industrial presence that is continuous and dominant, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the scale of visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This level of impact and its significance in the context of such a sensitive landscape has not been properly conveyed.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This deficiency introduces a risk that the magnitude of visual impact has been understated, thereby calling into question the reliability of the assessment.

Another significant shortcoming is the lack of evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their settings and cultural significance.

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

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

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

In conclusion, the assessment inadequately represents the magnitude of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage.

These deficiencies hinder a reliable evaluation and bolster the argument that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application relies on undefined future mitigation and contingency measures to be prepared after consent. This approach raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination.

While the application acknowledges risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these incidents will be prevented, controlled, or monitored. Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the competent authority's ability to assess whether sufficient safeguards are in place to respond to pollution events. This introduces procedural risk and raises significant concerns regarding environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated prior to consent, and the lack of such information means that a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application proposes a development that significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these vital uses and habitats can be protected or maintained in the face of potential disruptions.

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. As a result, without an evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended timeframe is likely to disturb species over large distances, notably impacting the local bottlenose dolphin population. Concerns regarding the predicted disturbance to a significant proportion of these dolphins are serious, yet the application appears to downplay these effects without providing adequate supporting evidence.

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

The assessment is lacking in its consideration of cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity. This lack of clarity prevents any conclusion that the proposal aligns with the principles of sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These issues ultimately hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure within the project is significantly deficient and does not adequately address the full range of impacts stemming from what constitutes a singular integrated project. The intrinsic link between the offshore turbines and the onshore works has not been recognised, leading to a disjointed evaluation that fails to reveal the true magnitude of the environmental and socio-economic ramifications.

The onshore components encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of associated access infrastructure through ecologically sensitive landscapes. These activities involve excavating areas characterised by deep peat, particularly within Barvas Moor, which represents an important carbon store and ecologically delicate habitat. The current application lacks a thorough assessment of these effects, thus obscuring a complete understanding of the project's overall environmental footprint.

The omission or postponement of assessments concerning onshore impacts obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated in conjunction, yet the segregated examination of offshore and onshore elements results in an incomplete comprehension of the combined impacts on peatlands, habitats, and local communities.

Moreover, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application has not sufficiently evidenced that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been implemented, thereby creating a notable evidential gap with respect to biodiversity preservation.

Further concerns arise regarding carbon balance; the disturbance of peatland may release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy initiatives. The application fails to adequately confront this issue or to prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land presents possible conflicts with pre-existing land use and legal rights. The application does not substantiate that the requisite consents or processes have been initiated, casting doubt on the project's deliverability and legal execution.

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

Collectively, the fragmentation of project elements, the absence of a thorough assessment, and the lack of evidence concerning environmental and land use impacts

render this portion of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

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

In summary, the lack of any assessment related to dark skies and nocturnal wildlife presents a substantial evidential void. The absence of baseline data, impact modelling,

and species-specific analysis renders the application incomplete and incapable of underpinning a lawful determination.

TOURISM

The assessment of tourism impacts related to the application is inadequate and overlooks the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

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

Furthermore, the assessment neglects to address the significance of environmental quality in enhancing tourism, including the value of unspoiled landscapes and dark skies to visitor experiences. This is particularly relevant for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding how the proposal could affect this recognised and developing aspect of the local economy.

In an island community that faces challenges in economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment signifies that these economic vulnerabilities have not been assessed 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 need to illustrate net benefit. It contradicts strategic goals that identify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

In summary, the failure to quantify tourism impacts, analyse environmental factors affecting visitor behaviour, and acknowledge the island's economic dependence leads to a significant evidential void. This hampers a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed excessively industrial. Presenting this application within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the underlying deficiencies.

The evidential basis for the proposal is incomplete and unreliable. Critical gaps in baseline data are evident, as is the continued utilisation of an undefined design envelope. Furthermore, the reliance on unspecified mitigation measures and the omission of significant impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, contribute to an Environmental Impact Assessment that is fundamentally inadequate. This lack of thoroughness hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are also apparent. The absence of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment constitutes a significant omission. Such deficiencies 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 of biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and there is a lack of evidence regarding net economic benefits, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals reveal inconsistencies. The evidential threshold required to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been satisfied, thereby engaging the precautionary principle and inhibiting lawful conclusions regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, compounded by conflicts with policy and unresolved environmental risks, prevent a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the

appropriate regulatory provisions to require the submission of the necessary missing information.

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

Additional Comments

The proposed wind farm will offer little benefit to the island. All power produced will be transported south by additional industrial infrastructure that already blights our environment. We continue to pay the highest bills in the UK and it seems ironic that this should be the case given the number of projects in the area.

Wild life, both birds and sea life will be adversely affected. There is little evidence of a credible impact study.

The precious dark skies which we are privileged to have will be ruined forever. The lights at the top of the turbines will destroy our skies. The northern lights and the stars will be lost to the inhabitants and the tourists who visit.

The turbines are exceptionally close to the shore and will dwarf any building on the island. They will destroy the view and the isolated aesthetic of the place. It is unthinkable to think of that level of wanton distraction.

Local residents will be subjected to an enormous increase in traffic and population during construction. Workers will not be recruited from the local area but housed on large workers camps. There is no infrastructure to support these workers.

Tourism will be destroyed. People come to visit the island for the isolation, the wildlife, the majestic beauty and the dark sky. These will be lost if this ill advised project is consented.

I am extremely concerned by the effect of infra sound and flicker lights. This has been identified as a problem but it has been scoped out of the application which condemns local residents to all the negative health impacts highlighted at the recent conference in Geneva.

Consultation with local residents was ill thought out and inadequate.

This project must not be consented. Local objections must be considered as a serious challenge to these outrageous plans.

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: ACC1C9FB

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. It draws upon a review of the Environmental Impact Assessment Report and the supporting documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively untouched environment, and strong cultural heritage. The scale and design of the project, along with its proximity to the shoreline, raise fundamental questions regarding compliance with statutory requirements, national policy, and the principles of sustainable development.

The documentation submitted fails to present a sufficient evidential foundation for lawful consideration. Essential environmental data is absent, while baseline information appears to be both limited and inconsistent. Additionally, critical elements of the proposal remain undefined, and the flexible design framework inhibits a comprehensive understanding of potential significant effects. The dependence on unspecified mitigation measures renders it impossible to assess their effectiveness, leading to a situation where the documentation does not provide a full or informed understanding of the environmental, cultural, or community impacts. Claims asserting negligible or non-significant effects lack robust evidential support.

There are evident and substantial 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 environments, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements designed to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly impact the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the coastline, raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations underscores that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be invoked.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment concerning onshore infrastructure is fundamentally lacking, failing to account for the comprehensive impacts stemming from this single integrated project. The connection between the offshore turbines and the onshore works is crucial; however, the evaluation treats these elements as distinct entities. This separation leads to a disjointed analysis that obscures the true magnitude of environmental and socio-economic repercussions.

Significant onshore works are involved, such as cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. Notably, excavation activities across regions of deep peat, especially within Barvas Moor—which serves as an important carbon store and ecologically sensitive habitat—are part of this project. The current application lacks a thorough assessment of these impacts, hindering a full comprehension of the environmental footprint associated with the project.

Moreover, the application's choice to exclude or postpone the assessment of onshore impacts impedes an accurate evaluation of cumulative effects. The Environmental Impact Assessment mandates that all elements of a project are considered in unison; however, the disjointed approach to offshore and onshore components means the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection, are also significant. The application fails to demonstrate a comprehensive assessment of the impacts on these habitats or to indicate that appropriate avoidance measures have been implemented. This gap in evidence regarding biodiversity protection is concerning.

Additionally, the proposal presents issues relating to carbon balance. The disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this critical matter or provide evidence that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal entitlements. There is insufficient evidence in the application to confirm that the required consents or procedures have been initiated, which raises doubts about the deliverability and lawful execution of the project.

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

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

TOURISM

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

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

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

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

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessary demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed when assessed against statutory duties, national policy, and evidential standards related to sustainable development. It echoes the key issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This current application is made under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

The evidential basis for this application is incomplete and unreliable. Critical gaps exist in the baseline data, there is reliance on an undefined design envelope, and mitigation measures are unspecified. Additionally, key impacts such as those on nocturnal wildlife, full onshore infrastructure, and tourism effects have been omitted. As a result, the Environmental Impact Assessment falls short and does not provide a clear picture of likely significant effects or any residual impacts.

There are procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, not fully disclosing the Social Impact Assessment is a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is at odds with National Planning Framework 4. It does not show evidence of protecting biodiversity, natural places, or cultural heritage. There is also no assurance that health and wellbeing impacts are acceptable, nor is there evidence of a net economic benefit since tourism impact modelling is absent. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, leaving effects on peatlands, carbon balance, habitats, and crofting land obscure.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals lack completeness and contain inconsistencies. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion on the acceptability of impacts.

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, disruptions to cultural and visual relationships, and negative impacts

on tourism are permanent effects that cannot be effectively mitigated.

In conclusion, the application is unfit for determination both procedurally and substantively. The volume of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should refuse consent for this application or utilise the appropriate regulatory measures to mandate the submission of the necessary missing information.

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

Additional Comments

I object to how close the wind farm is to the shore of the island. It is far too close

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: E291B0F0

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 processes. The objection arises from a review of the Environmental Impact Assessment Report and related documents. It highlights significant deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects. The project 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 are raised regarding the proposal's scale, proximity to the shoreline, and design, as these factors challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful determination. Important environmental data is absent, baseline information is insufficient and inconsistent, and vital components of the proposal remain undefined. The use of a flexible design framework does not allow for a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures means their efficacy cannot be evaluated. Consequently, the documents fail to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are notable and significant conflicts with policy. 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 health and wellbeing. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests required for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The proposal's scale is unprecedented for this area, with large turbines sited near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental effects. Overall, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, 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 invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and fails to deliver a comprehensive, transparent, or trustworthy account of the potential

environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This approach hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally lacking and fails to fulfil the statutory obligations of the Environmental Impact Assessment regime. Rather than delivering a structured and reasoned comparison of viable alternatives with respect to their environmental impacts, the application merely recounts the evolution of the project. This narrative fails to convincingly show that less harmful options have been identified, assessed, and selected over more damaging ones.

There is a notable absence of a transparent and evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not adequately illustrate that the developer has given serious consideration to positioning the turbines further offshore, a move that would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact, the lack of such analysis undermines any assertion that the proposed siting is the least damaging option available.

These deficiencies are also evident in the assessment of cable routing and landfall, where insufficient evidence is provided to indicate that alternative routes have been thoroughly explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been effectively implemented, instead leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful consideration of site selection, layout, and infrastructure routing. This shortcoming reflects a failure to adhere to the established mitigation hierarchy, which hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The absence of a rigorous alternatives assessment raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that leads to the overarching conclusion that the application has not been sufficiently evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species presented in the application is materially deficient. It fails to provide a complete or reliable understanding of the ecological receptors within this area. The methodologies employed do not adequately capture species presence, behaviour, and habitat use, leading to an incomplete baseline data set. Consequently, the assessment lacks a sound evidential basis for evaluating the impacts of the proposed development.

One significant oversight is the assessment of otters, a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. It neglects to consider their core foraging range and behavioural patterns, which means the potential effects of construction disturbance,

noise, and increased activity on otters have not been adequately assessed. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks is similarly flawed, as it relies heavily on aerial surveys that introduce a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when contrasted with established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and further weakens the reliability of the conclusions drawn in the application.

These methodological shortcomings imply that the conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. The absence of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and wider ecosystem interactions. This leads to uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4. The failure to properly identify or assess protected species creates a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a flawed ornithological assessment characterised by significant gaps in evidence and internal contradictions that undermine its conclusions. Located within key foraging areas and migratory pathways, the development's impact on the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, is inadequately demonstrated. There is no robust evaluation of the potential implications of displacement, collision risk, or habitat loss associated with this project.

A troubling contradiction arises as the developer claims no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence.

Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these critical feeding grounds is not fully considered, and the reliance on modelling approaches introduces additional uncertainty, especially for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality, particularly where baseline data is incomplete and behavioural responses are poorly understood.

The proposed siting of turbines within a recognised migratory corridor introduces further risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately 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 satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and renders a lawful conclusion in support of consent impossible.

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

Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and culminate in the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted lacks transparency and comprehensiveness. A Social Impact Assessment was commissioned by the developer, which included focus group discussions with local residents. However, the absence of the full report creates a substantial evidential gap, hindering both public understanding and the ability of the competent authority to assess the potential social risks identified through this research.

Available summaries suggest that the local residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts arise from direct engagement with the community, indicating that they are based on actual experiences rather than speculation. Nevertheless, the failure to publish the complete assessment prevents a thorough examination of the findings and diminishes the capacity to evaluate their

significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to the community's identity and cohesion, with a "cultural loss" noted in the developer's own findings. Despite acknowledging these impacts, they have not been adequately incorporated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

The lack of transparency further undermines the Environmental Impact Assessment process. An in-depth understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality are at stake. By failing to provide the complete dataset, the application does not present a thorough evidential foundation for weighing benefits against potential harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the evidence currently available indicates adverse effects that have not been fully acknowledged. Without the full assessment, demonstrating compliance with this policy is not feasible.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission constitutes a significant gap within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The lack of comprehensive detail in the assessment of construction and pollution risks is alarming, as it fails to provide the necessary information to evaluate potential environmental effects. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic setting, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be

formulated after consent is granted, which obstructs any meaningful evaluation of their potential adequacy or effectiveness.

This approach is particularly troubling given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it falls short of providing adequate detail on preventive, control, or monitoring measures.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Moreover, the absence of detailed emergency response procedures intensifies these concerns. By postponing contingency planning until after consent has been granted, the application inhibits a proper evaluation of whether sufficient safeguards are in place to handle pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent; when such information is absent, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

Collectively, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These 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 application reveals several critical deficiencies that undermine its reliability and comprehensiveness. Firstly, it is clear that there is an insufficient assessment of fisheries and marine life, failing to robustly evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry, yet the application does not adequately demonstrate that these vital uses and habitats can be preserved without causing significant disruption.

A particularly concerning aspect is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence that there are alternative fishing grounds that are accessible and able to accommodate additional pressure. This gap in information is important, as it raises the risk of overfishing in other areas and may lead to broader economic consequences for the local fishing fleet. Without a detailed, evidence-based assessment, the implications for fisheries and livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, notably through the noise generated by underwater construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to disturb marine life across considerable distances, particularly impacting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application minimises the importance of these effects and lacks adequate supporting evidence.

Additionally, there exists a contradiction within the application, wherein it acknowledges the necessity of licences to permit harm to European Protected Species, while simultaneously characterising such impacts as negligible. This inconsistency undermines the credibility of the assessment and raises substantial concerns regarding compliance with the Habitats Regulations, particularly where harm is expected to an extent that necessitates legal authorisation.

The application further neglects to address cumulative impacts that arise from a variety of pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

Finally, from a policy standpoint, the application falls short of demonstrating 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, which prevents any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project presents significant shortcomings in its assessment of the onshore infrastructure, which is critical to understanding the overall environmental and socio-economic impacts of what is essentially a unified initiative. While the offshore turbines and onshore works are interconnected, the current evaluation treats them separately. This disjointed approach leads to a failure in recognising the full scope of the environmental and socio-economic consequences.

Key elements of the onshore construction include cabling that traverses protected moorland, the establishment of a substation near Stornoway, and the development of access routes through delicate landscapes. Notably, these operations involve digging through areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically valuable habitat. The lack of a thorough assessment of these impacts restricts the understanding of the project's overall environmental footprint.

By deferring or neglecting the evaluation of onshore impacts, the application obstructs a proper consideration of cumulative effects. It is vital that all aspects of a project are assessed collectively, but the isolation of offshore from onshore activities obscures the comprehensive impacts on peatlands, habitats, and local communities.

There is a particular concern regarding the risks posed to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The application fails to show that the effects on these habitats have been fully evaluated or that appropriate measures to avoid harm have been implemented, leading to a notable deficiency in terms of biodiversity protection.

Moreover, the proposed routing of the infrastructure through active croft land raises potential issues with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, which casts doubt on the feasibility and legality of the project.

From a policy standpoint, the failure to treat the project as a cohesive whole and to adequately protect peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be effectively avoided or mitigated further weakens the application.

In summary, the fragmentation of project components, the lack of a thorough assessment, and the insufficient evidence regarding environmental and land use impacts contribute to making this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife represents a significant flaw within the Environmental Impact Assessment. The coastline of West Lewis is noted for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over considerable distances, is likely to create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally altering the night-time environment.

The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been considered in the application. This lack of assessment is particularly troubling given the vital role that dark skies play in the area's

identity and the emerging sector of astro-tourism. As a result, there is a significant gap in the overall evaluation of landscape and environmental factors.

Furthermore, there is no evaluation of how the proposed lighting may affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting, which can result in disorientation and heightened collision risks. The absence of a lighting impact assessment or a study on phototaxis means that the potential effects of aviation lighting on these species, and consequently their mortality rates, have not been addressed.

This issue is compounded by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and their associated risks. Other species, including Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this risk has not been evaluated. The lack of site-specific data collected during night-time creates a critical gap in understanding the ecological impacts.

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

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

In summary, the failure to assess dark skies and nocturnal wildlife results in a considerable evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and inadequate for supporting a lawful determination.

TOURISM

The evaluation of tourism impacts in the application is significantly lacking, failing to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's natural assets, including its wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it does not provide any quantified analysis of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has experienced considerable growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application fails to model how the industrialisation of the seascape and a decline in environmental quality could

affect Tourism Gross Value Added and the broader economic resilience of the island. Without such critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or instead jeopardise a vital and expanding sector.

Moreover, the assessment neglects to address the significance of environmental quality in bolstering tourism. The unspoiled landscapes and dark skies are crucial to visitor experiences, particularly for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, creating a substantial gap in the understanding of impacts on a recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the omission of tourism impact assessments has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as is mandated under the Islands (Scotland) Act 2018.

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

In summary, the collective failure to quantify tourism impacts, examine the environmental drivers of visitor behaviour, and recognise the island's economic dependency creates a substantial evidential gap. This deficiency undermines any robust evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This proposal mirrors the core issues of the 2008 Lewis Wind Power application, where the level of industrialisation was deemed unacceptable. Notably, it is now being advanced under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical examination reveals that the application does not present a comprehensive or reliable evidential basis for evaluation. There are significant gaps in baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures further complicates the assessment. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As such, the Environmental Impact Assessment is incomplete, failing to provide clarity on likely significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

Moreover, the proposal contravenes National Planning Framework 4. It does not adequately safeguard biodiversity, natural places, and cultural heritage. The evidence provided does not support that health and wellbeing impacts are acceptable, nor does it demonstrate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion on the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either reject this application on these grounds or invoke the relevant regulatory provisions to compel the submission of the missing information.

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

Additional Comments

The Spiorad na Mara Offshore Wind Farm will have a direct negative impact on our business. As a locally based business that runs landscape photography workshops, our clients come to experience and photograph the unspoilt beauty of Lewis. The workshops focus mostly on seascape photography and we use a lot of locations on the westside of 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: 16E34C89

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 its accompanying documents, highlighting material deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns surrounding the scale, proximity, and design of the proposal raise fundamental questions regarding its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation necessary for a lawful determination. There are notable gaps in critical environmental data, and the baseline information presented is both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework complicates the understanding of likely significant effects. The reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident throughout the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and undermine the capacity of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises significant issues, with large turbines planned in close proximity to the shoreline, which introduces serious concerns about landscape capacity, visual dominance, and overall environmental impact. In summary, the combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, it is essential 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, and trustworthy evaluation of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the assessment's integrity, making it difficult for both the public and the competent authority to grasp the true extent of environmental impacts.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is being requested with the expectation that environmental harm will be managed at a later stage. This approach hinders a meaningful evaluation of the measures' effectiveness and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and the use of assumptions rather than site-specific evidence. These issues create uncertainty regarding the magnitude and significance of impacts, especially where 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, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold set by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that proper safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives in the application is fundamentally insufficient and does not fulfil the legal requirements of the Environmental Impact Assessment process. Instead of offering a systematic and reasoned evaluation of viable alternatives based on their environmental impacts, the submission provides a narrative description of how

the project has developed. This method does not effectively demonstrate that less harmful options have been appropriately identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a lack of transparent and evidence-backed comparison concerning various offshore sites, development scales, or design configurations. The application notably fails to show that the developer has adequately considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be minimised. The sensitivity of the West Lewis coastline and the critical nature of proximity to the shore in assessing impact mean that the lack of such analysis hampers any conclusion regarding whether the proposed location is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient proof that alternative pathways have been thoroughly examined to prevent or lessen impacts on sensitive sites. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy to avoid these impacts and the lack of comparative analysis suggest that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not adequately prove that environmental harm has been reduced through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which impedes the competent authority's ability to ascertain whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it cannot be confirmed that the proposal is a sustainable or policy-compliant option.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks completeness and reliability, failing to provide a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, but the baseline data is insufficient, and the methodologies used do not adequately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment does not offer a strong evidential basis for evaluating potential impacts.

In particular, the application overlooks otters, a European Protected Species. It does not appropriately acknowledge or assess their usage of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity. This gap undermines any conclusions regarding the lack

of significant effects on this species.

Moreover, the assessment of basking sharks is inadequate, relying heavily on aerial surveys that introduce a significant detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show frequent utilisation of these waters. The failure to include or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime or National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Given these circumstances, granting consent is not 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 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 assessment of the proposed development is fundamentally flawed, lacking adequate evidence and containing significant internal contradictions that compromise its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not provide the necessary evidential assurance that these species will remain unaffected. The development is situated within crucial foraging areas and migratory routes, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly assessed.

A critical inconsistency arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions reached are not adequately supported by the available evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding areas is not fully acknowledged, and

reliance on modelling approaches introduces uncertainties, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the limitations of baseline data and the incomplete understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, significant risk by effectively creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently examine the long-term consequences of ongoing mortality within this corridor, nor does it consider the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful determination in favour of consent. The identified deficiencies also signify a non-compliance 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 negatively impacted places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These flaws impede a thorough evaluation of potential impacts and lead to the conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. The approach adopted by the application is reductive, treating heritage as a series of isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual function within the community.

A significant deficiency is evident in the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These are active places of burial and spiritual practice, yet the assessment categorises them as static features. This oversight neglects their continued use, meaning, and the potential impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their role within community life.

Moreover, the assessment does not consider intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity but are

entirely absent from the evaluation, representing a significant omission. The cultural impact of the development cannot be adequately understood without factoring in these components.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population possesses a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural failure is 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 hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy perspective, the identified 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 a lack of recognition of living cultural practices, constitutes a clear departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not provide a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a significant concern, as it directly undermines the integrity of the Environmental Impact Assessment process. Without this crucial document, it is impossible for the competent authority to conduct a thorough socio-economic and health evaluation. This omission represents a failure to meet the evidential requirements necessary for making an informed decision regarding the development.

Available summaries reveal that local residents are already experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These findings, derived from direct engagement, are not speculative. However, the absence of the full assessment hinders proper scrutiny of these impacts, limiting the ability to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal threatens community identity and cohesion. The developer's own findings highlight “cultural loss” as a consequence of the development. Despite this identification, such impacts have not been adequately

integrated into the main application or considered appropriately. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with this development.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4, particularly concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence at hand suggests existing adverse effects that remain undisclosed. Consequently, without the full assessment, compliance with this crucial policy cannot be established.

The overall assessment of social impacts, health, and wellbeing is materially deficient and lacks the necessary transparency for a lawful evaluation. This significant evidential gap prevents both the public and the competent authority from understanding the full extent of the social risks identified through the developer's own research. Taken together, the non-disclosure of the complete Social Impact Assessment, coupled with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation reinforces the conclusion that the application is unsupported by sufficient information for a lawful determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts presented in the application is significantly lacking and does not truly reflect the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would impose a continuous and intrusive industrial presence, leading to a fundamental alteration of this character and a permanent, irreversible transformation of the landscape.

There are significant methodological flaws in the selection and representation of visual viewpoints. Current evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This raises concerns about the possibility that the visual impact has been understated, thereby casting doubt on the reliability of the assessment.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. The current evaluation treats these heritage assets in isolation, failing to acknowledge their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these vital connections,

altering how heritage assets are perceived and severing their ties to the natural horizon. This not only represents a visual impact but also inflicts a more extensive 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, particularly concerning the preservation of natural areas and historical assets. The level of change proposed is fundamentally incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy compliance.

Moreover, 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, incapable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to provide an accurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal does not align with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal for construction within the high-energy Atlantic environment raises significant concerns due to its incomplete assessment of construction and pollution risks. Essential details required to evaluate the likely environmental effects are missing. The application involves substantial seabed preparation and installation works, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are set to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

The reliance on these undefined future measures is particularly alarming given the sensitivity of the receiving environment. The coastline of West Lewis is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks, including sediment mobilisation and accidental chemical or oil spills, it does not provide adequate detail on prevention, control, or monitoring of these issues.

Uncertainty persists 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 determine the extent, duration, or ecological effects of these impacts. This uncertainty is compounded when considering the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Moreover, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are established to handle pollution events. This not only introduces procedural risk but also undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed prior to granting consent; without this information, a lawful determination cannot be made. The application fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

In conclusion, the lack of defined mitigation measures, insufficient management plans, and uncertainty concerning potential impacts render the assessment materially deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the position that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the application is lacking in its evaluation of fisheries and marine life, failing to adequately address the ecological and socio-economic impacts. The fishing industry is active in the waters off the West Lewis coast, which also supports a diverse marine ecosystem. However, the application does not provide evidence that these habitats and activities can be protected or maintained without significant disruption.

A key concern is the assumption that fishing can be displaced without adverse effects. There is no evidence presented to show that alternative fishing grounds exist or can support the increased pressure from displaced activities. This significant omission raises the risk of overfishing in other areas, which could have wider economic implications for the local fishing fleet. Without a clear and evidence-based analysis, the potential impacts on fisheries and local livelihoods remain unclear.

The proposal also poses serious risks to marine species, particularly due to underwater noise from construction activities. High-energy hammer piling over prolonged periods is likely to disturb marine life over large distances, including species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimises these impacts and lacks sufficient supporting evidence.

There is an inconsistency within the application regarding the need for licences for any harm to European Protected Species. While acknowledging this necessity, the application also describes the impacts as negligible, which undermines the assessment's credibility. This contradiction raises compliance issues with the Habitats

Regulations, especially when potential harm that requires legal authorisation is anticipated.

Cumulative impacts from habitat disturbance, noise, and fishing displacement have not been adequately considered in the assessment. Without an in-depth 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 alignment with National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, hindering any determination of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely interconnected; however, they are evaluated separately, resulting in a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Onshore elements involve significant interventions, including cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities entail excavation through areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered in unison; yet, the disconnection between offshore and onshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately addressed.

There are significant risks to sensitive habitats such as machair systems and peatland environments, which are under policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures are in place, leaving an evidential gap regarding biodiversity protection.

Furthermore, the proposal raises serious concerns about carbon balance. The

disturbance of peatland could release stored carbon, potentially resulting in a carbon debt that counters the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence in the application to show that the required consents or processes have been initiated, prompting questions about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate 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 weakens the application.

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

TOURISM

The application does not adequately assess the impacts on tourism, which is a vital sector for the Isle of Lewis. This sector relies heavily on the area's natural features, including its wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the assessment lacks a numerical evaluation of how large offshore structures might influence visitor numbers, their behaviour, or their overall economic contributions.

Tourism has experienced significant growth, increasing from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and constituting about 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and a decline in environmental quality would affect Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would benefit the economy or harm this established sector.

Additionally, the evaluation overlooks the critical role that environmental quality plays in supporting tourism. This includes the necessity of unspoiled landscapes and dark skies for visitor satisfaction and for emerging sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant lack of understanding regarding impacts on an important and growing aspect of the local economy.

In an island community that has limited economic diversity, neglecting to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact

Assessment signifies that these economic vulnerabilities have not been properly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4, especially regarding economic impacts and the necessity to demonstrate net benefits. It also contradicts strategic goals that identify tourism as a key growth sector and does not furnish enough evidence for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the lack of quantification of tourism impacts, the failure to assess the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependencies create a substantial evidential gap. This gap hinders a thorough examination of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development in accordance with statutory duties, national policy, and evidential standards. It mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current proposal, however, is presented against a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for determination, including critical gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, the complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory requirements set forth in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission. These gaps hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially

significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative impacts on tourism constitute permanent effects that cannot be mitigated to an acceptable standard.

In summary, the application is 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 refuse consent on these bases or invoke the relevant regulatory provisions to mandate the submission of the requisite missing information.

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

Additional Comments

The industrial scale of this site will undoubtedly alter the visual and audible environment of the islands. The unspoilt beauty of the islands is a rare commodity in the modern world and brings people here from around the globe. This will change.

Their presence in such scale will certainly negatively impact tourism, house prices and daily life.

They have a proven impact on birdlife, in particular large raptors, for which the islands are popular.

I don't believe the environmental impact assessment has taken into account the life cycle of the turbines. The tonnes of concrete per base, the rare earth minerals, the carbon fibre (a health concerning pollutant when damaged) and the bunker fuel used in shipping them across the globe. All deserve consideration.

Taking the visual scaring of the scenery to one side, large scale windfarms generate a significant amount of noise that carries far downwind. 6km off shore will impact the people living along the west coast.

This project must also be taken into consideration with the other industrial scale onshore windfall planned for the island. Small scale community projects are fine, but the industrial scale vandalism of the natural environment of the islands will impact all aspects of the community in large way. There is a depopulation problem already, I can't see this helping, even with that.

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: 09887C55

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 examination of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for lawful determination. It suffers from significant omissions in critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The use of a flexible design framework hinders a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures precludes an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsupported by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly pertinent concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate adherence to national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the proposal's acceptability within policy frameworks.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance collectively indicates that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally 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 proposed development raises serious concerns regarding its impact on marine ecology and protected species in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the assessment presented is materially deficient, lacking a comprehensive and reliable understanding of the ecological receptors present. The methodologies employed do not effectively capture

critical aspects of species presence, behaviour, and habitat use, resulting in an incomplete baseline.

One significant oversight is the failure to adequately recognise and assess the presence of otters, a European Protected Species, which actively forage and move through coastal regions. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased human activity remain unexamined. This gap undermines any conclusions regarding the absence of significant effects on otters.

Furthermore, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys, which are prone to detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of these sharks when compared to established land-based observations that indicate a regular use of these waters. The neglect of such relevant data leads to an inadequate baseline and compromises the reliability of the conclusions drawn.

Due to these methodological shortcomings, the assertion of negligible or non-significant effects is based more on assumptions than on solid evidence. The lack of sufficient baseline data also hampers a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and interactions within the broader ecosystem. This uncertainty raises questions about the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The resulting uncertainty prevents the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment's deficiencies are significant and demonstrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The proposal is in direct conflict with national policy, as it cannot adequately show that internationally important seabird populations will remain unaffected.

The application fails to meet the evidential threshold required to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates

that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which prohibits a lawful conclusion in favour of consent.

The assessment lacks sufficient evidence concerning the seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully taken into account, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully understood.

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

There exists a fundamental contradiction within the application; the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence presented.

Overall, the assessment is fundamentally flawed, characterised by internal inconsistency, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. The approach adopted by the application is reductive, treating heritage as a series of isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual function within the community.

A significant deficiency is evident in the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These are active places of burial and spiritual practice, yet the assessment categorises them as static features. This oversight neglects their continued use, meaning, and the potential impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their role within community life.

Moreover, the assessment does not consider intangible cultural heritage, such as the

Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the evaluation, representing a significant omission. The cultural impact of the development cannot be adequately understood without factoring in these components.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population possesses a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural failure is 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 hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy perspective, the identified 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 a lack of recognition of living cultural practices, constitutes a clear departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not provide a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not had its full report published. This lack of disclosure represents a significant evidential gap that impedes both the public and the competent authority from comprehending the complete range of social risks uncovered by the developer's own research. Without access to the full assessment, the ability to properly scrutinise the findings is severely limited, thereby obstructing the assessment of their significance in the decision-making process.

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

given the appropriate consideration they warrant.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not sufficiently represent the magnitude of the visual change that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. This significant level of impact has not been properly conveyed, especially in the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk

that the actual visual impact has been understated, which undermines the reliability of the assessment.

An additional deficiency in the assessment is its failure to consider 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 setting, visually and spatially linked to the Atlantic horizon. Instead of acknowledging their interdependence, the assessment treats these heritage assets as isolated, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This impact is not merely visual; it represents a broader cultural and spatial harm that has not been adequately assessed. From a policy standpoint, the proposal contradicts National Planning Framework 4 in terms of protecting natural places and historic assets. The scale of the proposed changes 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 assertion of policy compliance.

Lastly, it is clear 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. This change is fundamental and permanent, incapable of reduction to an acceptable level through mitigation. Collectively, these deficiencies in the assessment prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are essential for evaluating potential environmental effects. It entails extensive seabed preparation and installation activities within a high-energy Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead proposes to rely on mitigation and contingency measures that would be formulated after consent, which hinders any substantial assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is alarming, particularly in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer adequate detail on methods for prevention, control, or monitoring of these risks.

Moreover, there remains uncertainty regarding the scale and dynamics of sediment plumes generated from seabed disturbance and cable installation. In the absence of

rigorous modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to possible effects on marine species and habitats already identified as sensitive within the broader assessment.

The lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are available to address pollution incidents. This situation not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to granting consent, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts renders the assessment materially inadequate. These inadequacies obstruct a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application presents an inadequate assessment of fisheries and marine life, failing to provide a reliable evaluation of both ecological and socio-economic impacts. There is a troubling assumption that fishing activities can be displaced without consequences, yet the application does not offer evidence that alternative fishing grounds exist or are accessible to accommodate the additional pressure. This significant omission raises concerns about potential overfishing in other areas and could have broader economic ramifications for the local fishing fleet.

Furthermore, the proposal carries substantial risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is anticipated to cause disturbances across large distances, which could adversely affect species such as dolphins. Alarmingly, the predicted disturbance to a notable portion of the local bottlenose dolphin population is downplayed within the application, lacking sufficient supporting evidence to address these serious concerns.

There is also a notable inconsistency in the application regarding the need for licences to permit harm to European Protected Species, as it acknowledges the requirement for such authorisation while simultaneously describing the impacts as negligible. This

contradiction undermines the assessment's credibility and raises issues about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal approval.

Moreover, the assessment neglects to 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, the overall impact on marine ecosystems and the socio-economic landscape remains uncertain.

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

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers or the overall economic contribution of tourism. This is particularly concerning given that tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs. The sector accounts for as much as 16% of the island's economy. However, the application does not model the potential economic impacts of industrialisation on the seascape or the resulting loss of environmental quality. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the vital role of environmental quality in enhancing the tourism experience. Unspoiled landscapes and dark skies are crucial to attracting visitors, particularly in emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in the understanding of the proposal's effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the lack of analysis regarding tourism impacts bears broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated, contrary to the requirements of the Islands (Scotland) Act 2018.

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

National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposed development.

Taken together, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects of the proposal and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. It raises the same fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This application is now presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for decision-making is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and it relies on unspecified mitigation measures. Furthermore, key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks the completeness needed to fully understand the likely significant effects or any residual impacts.

There are also serious procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a material omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that the health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is no tourism impact modelling included. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary

to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed project would lead to substantial and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, leading to permanent effects that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or utilise the necessary regulatory provisions to demand the submission of the missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is completely refused.

Additional Comments

N4 is going to loose me a lot of money by impacting my accomadation rental and de value my home and property with zero gain to me or this 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: 01778FC0

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact.

A review of the Environmental Impact Assessment Report and supporting documentation reveals material planning, environmental, cultural, and procedural deficiencies. The application fails to provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The use of a flexible design framework hinders a clear understanding of likely significant effects. Moreover, reliance on unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are clear and substantive policy conflicts present in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to determine that the development aligns with policy requirements.

Overall, the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, represents a major shortcoming in the assessment. These sites serve as active places for burial and spiritual practice; however, they have been categorised merely as static features. This oversight fails to acknowledge their ongoing use and significance, as well as the potential impact of development on their setting. Such a mischaracterisation leads to an inadequate evaluation of cultural effects and neglects

their importance within community life.

Furthermore, the assessment overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment. These elements are vital to the area's identity and have been wholly disregarded, marking a significant omission. The lack of consideration for these factors means the cultural impact of the proposed development cannot be fully comprehended.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses distinct characteristics of an Indigenous People, has not been granted the opportunity for Free, Prior and Informed Consent. The absence of this meaningful engagement diminishes the credibility of the assessment and contradicts established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to take into account both tangible and intangible heritage, and to recognise living cultural practices, represents a clear deviation from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not present a robust foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts lacks comprehensiveness and does not fully capture the extent of change or the sensitivity of the surrounding environment. The character of 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 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 fails to accurately depict the scale of visual change. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity

and diminish the defining qualities of naturalness and remoteness. The assessment does not effectively convey the significance of these impacts within such a sensitive landscape.

Methodological issues arise regarding the chosen visual viewpoints. There is evidence that the viewpoints may not represent the most sensitive receptors or extreme scenarios, particularly concerning important cultural heritage sites and valuable landscapes. This raises concerns that the visual impact may have been underestimated, compromising the assessment's reliability.

Additionally, the assessment does not account for the interconnectedness of landscape, seascape, and cultural heritage. Notably, sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape connected visually and spatially to the Atlantic horizon. Treating these sites as separate entities ignores their interdependence and results in an inadequate analysis of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal contradicts the National Planning Framework 4, particularly in terms of protecting natural areas and historical assets. The magnitude of change is at odds with the need to preserve landscape character, visual amenity, and the contexts of culturally important sites. The lack of a thorough worst-case scenario assessment further weakens any claims of adherence to policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The resulting changes are fundamental and permanent, unable to be 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, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking. It does not provide enough detail to understand the likely environmental effects. The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be created after consent, which hinders any proper evaluation of their adequacy or effectiveness.

This dependence on unspecified future measures raises concerns, especially given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. While the application acknowledges the risks associated with sediment mobilisation and accidental chemical or oil spills, it fails to offer sufficient information on how these risks will be prevented, controlled, or monitored.

There is uncertainty about the size and behaviour of sediment plumes caused by seabed disturbance and cable installation. Without reliable modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the 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 issues. By postponing contingency planning until after consent is granted, the application limits the ability to evaluate whether adequate measures are in place to respond to pollution events. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

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

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks and strengthen the view that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally flawed and fails to acknowledge the comprehensive impacts stemming from a single integrated project. The offshore turbines and onshore works are interconnected yet are evaluated separately, leading to a disjointed approach that clouds the real environmental and socio-economic consequences.

The onshore components involve cabling traversing protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through delicate landscapes. These undertakings require excavation across areas of deep peat, especially within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive area. The application lacks a thorough assessment of these

effects, hindering a full comprehension of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements be reviewed together; however, the disconnection of offshore and onshore components results in a failure to grasp the combined impacts on peatlands, habitats, and local communities.

Moreover, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application does not provide evidence that the impacts on these habitats have been sufficiently assessed or that suitable avoidance measures have been enacted, leaving a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy initiatives. The application inadequately addresses this concern and does not demonstrate that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land may introduce conflicts with existing land use and legal rights. The application fails to offer evidence that the necessary consents or procedures have been initiated, casting doubt on its deliverability and lawful execution.

From a policy standpoint, the failure to evaluate the project as a cohesive whole and to demonstrate the protection of peatlands, habitats, and land use interests contravenes the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal significantly neglects to assess the impact of permanent red aviation lighting, which would create a continuous and intrusive "wall of light" effect across the western horizon. This lighting is visible over long distances and would fundamentally alter the night-time environment of the West Lewis coastline, an area characterised by exceptionally dark skies that contribute to its environmental quality, cultural identity, and tourism value. The failure to evaluate these impacts on visual amenity, landscape character, or the experiences of residents and visitors is a major oversight, especially given the growing importance of dark skies to the area's identity and sectors such as astro-tourism.

Furthermore, there is a glaring omission in the assessment of impacts on nocturnal

wildlife, particularly species that are sensitive to artificial lighting, such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel. These species are at risk of disorientation and increased collision due to phototaxis, yet the application fails to include any lighting impact assessment or phototaxis study, leaving a crucial gap in understanding how aviation lighting may affect these species and increase mortality rates. The reliance on daytime survey data for the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been considered.

Without a thorough assessment of nocturnal impacts, it becomes impossible to determine whether protected species or designated sites may be adversely affected. The application does not meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecological framework. The absence of any assessment of dark skies and nocturnal wildlife culminates in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The assessment regarding the impacts on tourism is significantly lacking and does not adequately evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly unspoiled landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantifiable assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not model the effects that the industrialisation of the seascape and the degradation of environmental quality would have on Tourism Gross Value Added or broader economic resilience. In the absence of such an analysis, it remains unclear whether the development would generate a net economic benefit or detract from an already established and expanding sector.

Moreover, the assessment neglects to account for the critical role that environmental quality plays in tourism, including the significance of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this

shortcoming, leaving a substantial gap in the understanding of the impacts on a recognised and growing segment of the local economy.

Considering the context of an island community with limited economic diversification, the failure to 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 scrutinised as mandated by the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency lead to a significant evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards necessary for sustainable development when evaluated against relevant statutory duties and national policies. This situation mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Presently, the application is submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a reliable and complete evidential basis for decision-making. It is marked by significant gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a comprehensive understanding of the likely significant effects and residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment represents a violation of statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a material 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.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It

does not effectively demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to provide evidence that health and wellbeing impacts are acceptable, or that there is a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are both incomplete and, at times, inconsistent. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

Moreover, the proposal is poised to induce 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 adverse impacts on tourism are all permanent consequences that cannot be adequately mitigated.

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

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

Yours faithfully,

[Redacted]

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: 78D2BE57

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

Dear Sir/Madam

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

The application lacks a sufficient evidential basis for a lawful determination, with critical environmental data either missing or inadequate. Baseline information provided is inconsistent, and several key elements of the proposal remain undefined. The flexible design framework employed prevents a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their efficacy unverified. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and claims asserting negligible or non-significant effects are not underpinned by credible evidence.

Moreover, there are explicit and substantial conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not satisfactorily demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal introduces significant concerns, particularly with large turbines positioned alarmingly close to the shoreline. This raises issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the deficiencies in information, reliance on vague mitigation strategies, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and cannot sustain a lawful determination. In light of these findings, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable account of the potential environmental impacts of the proposed development. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This ambiguity compromises the integrity of the assessment and means that the impacts outlined may not accurately reflect those of the actual development, thus preventing both the public and the competent authority from grasping the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is sought on the basis that any environmental harm will be addressed later, which obstructs a meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of vital information to post-consent stages is procedurally unacceptable and undermines the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

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

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it is not possible to show that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a thorough or dependable understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data is incomplete. The methodologies employed do not

sufficiently capture species presence, behaviour, and habitat use, resulting in a lack of a solid evidential foundation for evaluating impacts.

A significant shortfall in the assessment concerns 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. Consequently, the lack of evaluation regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This gap undermines any conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to the reliance on aerial surveys, which introduce considerable detection bias, especially in Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that indicate frequent usage of these waters. The failure to properly incorporate or consider such data results in an incomplete baseline, diminishing the reliability of the conclusions reached.

These methodological flaws lead to assertions of negligible or non-significant effects based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to 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. In light of these circumstances, consent cannot be lawfully granted.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application proposes a development that 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 intrinsically connected. The evaluation adopts a reductive view of heritage, treating it as isolated and static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant deficiency in the assessment is the 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 categorised as static features, overlooking their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their essential role in community life.

Furthermore, the application neglects to assess intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely absent from the assessment, representing a considerable omission. Without considering these factors, the cultural impact of the development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the validity of the assessment and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure in the application is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination.

From a policy perspective, these deficiencies 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 of living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been properly 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 proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap that hampers understanding of the social risks identified by the developer's own research. This lack of transparency is critical, as it prevents both the public and the competent authority from grasping the complete picture.

Available summaries suggest that residents are already facing measurable stress,

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

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

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

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

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

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

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 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.

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: D679D251

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

Dear Sir/Madam

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

A review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application does not provide an adequate evidential basis for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Additionally, many aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to support an informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Furthermore, there are notable policy conflicts, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts undermine the ability of the competent authority to determine that the development is acceptable within the required policy framework.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance highlight that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must apply.

ASSESSMENT OF ALTERNATIVES

The application exhibits significant deficiencies in its assessment of alternatives, failing to satisfy the statutory requirements of the Environmental Impact Assessment regime.

It does not provide a structured and reasoned comparison of feasible alternatives based on their environmental impacts. Instead, it offers a narrative account of project development, which does not adequately demonstrate that less harmful options have been identified, evaluated, and selected over more damaging alternatives.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely considered the possibility of situating turbines further offshore, where the associated visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline, and the crucial role that proximity to shore plays in assessing impact, the lack of this analysis hinders any conclusion that the proposed location is the least damaging option available.

Furthermore, these inadequacies extend to the evaluation of cable routing and landfall assessment. There is insufficient evidence demonstrating that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy, along with the absence of comparative analysis, implies that mitigation through design has not been implemented, resulting instead in a 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 oversight represents a disregard for the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. The omission of a robust alternatives assessment precludes the conclusion that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency weakens adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, contributing to the overarching determination that the application has not been sufficiently evaluated and cannot support a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The assessment of cultural heritage and community identity within the application fails fundamentally, as it adopts a reductive approach by treating heritage as a collection of isolated and static assets. This perspective neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

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

cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are merely characterised as static features within the assessment. This mischaracterisation ignores their ongoing use, significance, and the potential impact of development on their surrounding environments. Consequently, the evaluation of cultural effects remains incomplete, and the essential role these sites hold within community life is disregarded.

The assessment further fails to account for intangible cultural heritage, which includes vital components such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are central to the identity of the area, yet they are completely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinctive cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and does not align with established principles regarding participation in decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure exists in the absence of a compliant Island Communities Impact Assessment, a statutory requirement outlined in 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. This omission alone hinders lawful determination.

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to recognise living cultural practices, represents a departure from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, leaving the application insufficient for evaluating the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application is fundamentally flawed due to the failure to disclose the full Social Impact Assessment, which significantly impairs the evaluation of social impacts, health, and wellbeing. This lack of transparency is critical; without access to the comprehensive report commissioned by the developer, which included local residents in focus groups, the public and the competent authority are left uninformed about the social risks highlighted in the developer's own research. This evidential gap represents a serious oversight.

Residents are already facing quantifiable levels of stress, anxiety, and concern linked to the proposal's scale and proximity. These impacts are grounded in direct community engagement rather than speculation. However, without the complete assessment, these findings cannot be properly scrutinised or understood in context, thereby limiting the capacity to assess their significance in the decision-making process.

Moreover, there are indications that the development poses a threat to community identity and cohesion, with references to "cultural loss" arising from the developer's findings. Regrettably, these critical aspects have not been fully incorporated into the application, nor have they been assigned adequate importance. The withholding of the complete Social Impact Assessment clouds the genuine human and social costs associated with the development.

This lack of transparency also weakens the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when they may disrupt community character and functioning. The absence of the complete dataset leads to an incomplete evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are meant to enhance positive health outcomes and mitigate harm, yet the existing evidence reveals adverse effects that have not been fully addressed. Without the complete assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are profound. The competent authority is unable to conduct a rigorous socio-economic and health evaluation in the absence of the full Social Impact Assessment, constituting a material omission within the application and failing to meet the evidential standards of the Environmental Impact Assessment regime. Collectively, the non-disclosure of the complete Social Impact Assessment, coupled with the documented adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change and the sensitivity of the local environment. The West Lewis coastline is characterised by an open Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. Introducing large-scale turbines near the shoreline would result in a dominant industrial presence that fundamentally transforms this unique character, leading to a permanent and irreversible alteration of the landscape.

The magnitude of the anticipated visual change is not adequately represented in the application. Given the scale and proximity of the turbines, they would significantly

dominate 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 convey this level of impact or its importance in the context of such a sensitive landscape.

Concerns arise regarding the methodology used to select and present visual viewpoints, as evidence indicates that these may not accurately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests the potential understatement of the visual impact, which undermines the reliability of the assessment.

Moreover, the assessment neglects the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape setting that is linked through visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of the proposed changes is not compatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further diminishes the credibility of any claims of policy compliance.

Ultimately, 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.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and emphasise the conclusion that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks raises significant concerns regarding its ability to adequately evaluate potential environmental effects. The proposed works, which entail considerable seabed preparation and installation within a dynamic Atlantic environment, lack fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the

application suggests relying on mitigation and contingency measures that would be formulated after consent has been granted. This approach undermines any thorough assessment of the proposed measures' adequacy or effectiveness.

The sensitivity of the receiving environment further exacerbates these issues. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilisation and possible chemical or oil spills, it fails to provide adequate details on preventative, control, or monitoring strategies.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to the potential effects on marine species and habitats, which have been identified as sensitive in the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address potential pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferment of essential environmental safeguards conflicts with the requirements stipulated by the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated prior to granting consent; when this information is absent, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment notably lacks an evaluation of dark skies and nocturnal wildlife, representing a significant omission. The proposal suggests introducing permanent red aviation lighting, which would be visible over long distances, creating an intrusive “wall of light” effect across the western horizon. This would drastically alter the night-time environment.

The application fails to consider the impact of this lighting on visual amenity, landscape character, and the experience of both residents and visitors. The importance of dark skies to the area's identity and its developing tourism sectors, such as astro-tourism, makes this oversight particularly concerning. This lack of assessment results in a clear gap in the overall landscape and environmental evaluation.

Furthermore, there is no analysis 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 increase collision risks. The application lacks a lighting impact assessment or phototaxis study, failing to address how aviation lighting may affect these species and potentially raise mortality rates.

The situation is further complicated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or related risks. Kittiwakes, for example, may forage or migrate at night and are also at risk of disorientation from artificial lighting. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, necessitating the application of the precautionary principle and preventing a lawful determination.

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

Collectively, the lack of assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts presents significant deficiencies, failing to evaluate 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 landscape, dark skies, and sense of remoteness. The application notes that 86% of visitors are attracted by the scenery, yet it does not provide any quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the Isle of Lewis has experienced considerable growth, rising from £65

million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. Nevertheless, the application neglects to model how the potential industrialisation of the seascape and deterioration of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the island. The lack of such analysis raises concerns about whether the proposed development would yield a net economic benefit or detract from an established and thriving sector.

Furthermore, the assessment does not adequately consider the vital role of environmental quality in attracting tourists, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this oversight, resulting in a substantial gap in understanding the impacts on a growing segment of the local economy. In a community with limited economic diversification, the failure to assess tourism impacts poses broader risks to employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unaddressed, as required under 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 need to illustrate a net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal. Overall, the lack of quantified tourism impacts, the inadequate assessment of environmental influences on visitor behaviour, and the disregard for the island's economic dependence culminate in a significant evidential gap. This hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. It presents similar issues to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application is submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and key impact pathways that have been overlooked, such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete and does not provide a thorough understanding of the likely significant effects or residual impacts.

There are procedural issues as well. The absence of a compliant Island Communities

Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

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

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

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

As a result, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused entirely.

Additional Comments

I stand with many members of our island community in opposing this wind farm development which will have a massively disruptive impact on the landscape and culture of Lewis, with - as far as I can see - very few meaningful benefits for islanders. The whole process feels exploitative and extractive.

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: A9199417

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

Dear Sir/Madam

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

The application lacks a sufficient evidential basis for a lawful determination. Critical environmental data is missing, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The adoption of a flexible design framework complicates the understanding of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation does not provide a comprehensive or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are clear 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, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to 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 compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact, as large turbines are planned to be located in close proximity to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and insufficient for lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential environmental impacts of the proposal. A flexible Project Design Envelope is employed without commitment to specific dimensions or configurations of turbines, resulting in considerable uncertainty. This lack of specificity hinders the consistent application of a worst-case scenario, thus compromising the integrity of the assessment. Consequently, the impacts outlined may not correspond to the actual development, obscuring the true extent of environmental effects for both the public and the competent authority.

The application predominantly hinges on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought on the premise that any environmental damage will be managed at a later stage. This approach inhibits any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of crucial information to post-consent phases is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies are explicitly established before the determination process.

Moreover, there exist substantial evidential shortcomings, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions instead of robust site-specific evidence. This leads to uncertainty regarding both the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not satisfy the evidential standard 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 does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, 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 significant deficiencies impede a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives as required under the Environmental Impact Assessment regime. It does not provide a structured comparison

of viable options based on their environmental impacts. Instead, it offers a narrative of project evolution, which does not effectively demonstrate that less harmful alternatives have been properly identified, evaluated, and chosen over more damaging options.

There is a lack of transparent and evidence-based evaluation of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The West Lewis coastline is particularly sensitive, and the significant role of proximity to shore in assessing impact means that the absence of such analysis inhibits any conclusion that the proposed siting is the least damaging option.

The shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation through design has not been employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not sufficiently 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's ability to assess whether less harmful and more suitable alternatives are available. In the absence of a comprehensive alternatives assessment, it cannot be affirmed that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies impede compliance with National Planning Framework 4, especially regarding the protection of natural spaces, cultural heritage, and community well-being. The omission of a structured and comparative assessment is a significant shortcoming, contributing to the conclusion that the application has not been sufficiently evaluated and cannot lawfully proceed to determination.

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 provided is fundamentally flawed, revealing significant gaps in evidence and internal contradictions that compromise its findings. It has been recognised that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already in decline. However, the application fails to establish, to the necessary evidential standard, that these species will not suffer adverse effects. Key foraging areas and migratory pathways have been identified within the development location, yet the assessment inadequately considers the potential impacts related to displacement, collision risk, and habitat loss.

Notably, there exists a critical contradiction within the application. The developer claims that there will be no significant adverse effects while concurrently presenting a Habitats Regulations derogation case, which is only necessitated if significant harm is

anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided.

Furthermore, the assessment falls short in demonstrating that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is insufficiently acknowledged, and the reliance on modelling techniques introduces a degree of uncertainty, particularly concerning species that are in severe decline, including Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, especially in the context of incomplete baseline data and an inadequate understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional risk, effectively 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 are not adequately assessed, nor are the potential repercussions for species with relatively small global populations.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow view, treating heritage as separate, static entities, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for

burial and spiritual practices, yet are classified merely as static features in the assessment. This classification neglects their current use, meaning, and the implications of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their vital role in community life.

Additionally, the assessment does not adequately address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These factors are crucial to the area's identity but have been entirely disregarded, resulting in a significant oversight. Without considering these elements, the cultural ramifications of the proposed development cannot be comprehensively understood.

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

A serious procedural lapse is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not provide a solid foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer has engaged local residents through focus groups, the absence of the complete report represents a significant evidential gap. This gap restricts both public understanding and the competent authority's ability to fully grasp the social risks highlighted in the developer's own research.

Evidence shows that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are thus factual, not speculative. The lack of transparency in sharing the full assessment hinders proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Moreover, there is a perception among residents that the proposal threatens community identity and cohesion, with indications of “cultural loss” noted in the developer’s findings. Yet, these social impacts have not been adequately integrated into the application or given the necessary weight. Consequently, the withholding of the full assessment obscures the true human and social cost of the development.

This failure of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when they may affect community character and functioning. Without the full dataset, the application lacks a comprehensive evidential basis for weighing the balance between potential benefits and harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Consequently, it is impossible to demonstrate compliance with this policy in the absence of the full assessment.

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 entire Social Impact Assessment. This omission constitutes a material flaw within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the complete Social Impact Assessment and the documented existence of adverse impacts renders the assessment incomplete and unreliable. This situation obstructs 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 and undeveloped nature, contributing to a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it fails to adequately reflect the

scale of change or the sensitivity of the receiving environment.

The application does not accurately convey the magnitude of the visual change. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and frequently used coastal locations. This dominance would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment does not sufficiently communicate the significance of this impact within such a sensitive landscape context.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk that the magnitude of the visual impact has been understated, thereby undermining the reliability of the assessment.

Another significant shortcoming is the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape setting, visually and spatially linked to the Atlantic horizon. Treating these as isolated assets instead of recognising their interdependence leads to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This presents not only a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy perspective, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment undermines any claims 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 resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the 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 presents significant shortcomings regarding the assessment of construction and pollution risks, which are crucial for understanding likely

environmental effects. It includes extensive seabed preparation and installation works within a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. The application instead depends on mitigation and contingency measures that are to be prepared after consent, thereby hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling, considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application does acknowledge risks such as sediment mobilisation and the potential for accidental chemical or oil spills, but it fails to supply sufficient detail on how these will be prevented, controlled, or monitored effectively.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs any evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent; the absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts render the assessment materially deficient. These weaknesses inhibit a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application under review lacks a thorough assessment of fisheries and marine life, failing to provide a robust evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these important uses and habitats can be protected or maintained

without substantial disruption.

A significant concern within the application is the assumption that fishing activities can be displaced without any consequences. There is no evidence presented to indicate that alternative fishing grounds are available, accessible, or capable of sustaining any increased pressure from displaced activities. This critical omission poses a risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and evidence-based evaluation, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is likely to cause disturbances over large distances, negatively affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious concerns; yet, the application appears to downplay these potential effects without sufficient supporting evidence.

There exists a notable inconsistency in the application regarding the necessity for licenses to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues concerning compliance with the Habitats Regulations, particularly when harm is anticipated to a degree that warrants legal authorisation.

Additionally, the assessment fails to take into account the cumulative impacts that arise from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Absent a comprehensive evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of demonstration prevents any conclusion that the proposal aligns with sustainable development principles.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project lacks completeness, particularly concerning the onshore infrastructure, which is critical to understanding the full range of impacts associated with this integrated project. The offshore turbines and onshore works are fundamentally interconnected, yet the current assessment treats them separately. This fragmented approach obscures the true scale of the environmental and socio-economic consequences.

The onshore components encompass the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and necessary access infrastructure that traverses sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive area. The application fails to provide a comprehensive assessment of the impacts on these environments, leading to an incomplete understanding of the overall environmental footprint of the project.

Moreover, the exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively; however, the division between offshore and onshore elements results in an inadequate understanding of the combined impacts on peatlands, habitats, and local communities.

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

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not show that the necessary consents or processes have been initiated, calling into question the project's deliverability and legality.

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

In summary, the disjointed evaluation of project components, the lack of a comprehensive assessment, and the absence of evidence concerning environmental and land use impacts render this part of the application incomplete and untrustworthy, obstructing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to consider the assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline boasts exceptionally dark skies, contributing to the area's environmental quality, cultural identity, and tourism potential. The proposal intends to introduce permanent red aviation lighting that would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

The application lacks an evaluation of the lighting's impact on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies for the area's identity and the emerging tourism sector focused on astro-tourism. The neglect to assess these factors creates a discernible gap in the overall landscape and environmental evaluation.

Moreover, there is no analysis regarding the impact on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The application does not contain a lighting impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the possibility of increased mortality.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation from artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out adverse impacts beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecology.

In conclusion, the lack of any evaluation regarding dark skies and nocturnal wildlife represents a considerable evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and unable to support a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is significantly inadequate, neglecting to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The area's tourism thrives on its wild coastline, almost untouched landscapes, dark skies, and the feeling of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions made by tourism.

Tourism in the region has experienced notable growth, escalating from £65 million in 2017 to over £81.5 million, which sustains more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not explore how the anticipated industrialisation of the seascape and degradation of environmental quality might affect the Tourism Gross Value Added or the resilience of the broader economy. Without this critical assessment, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the analysis does not adequately address the significance of environmental quality for tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and burgeoning markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a notable absence in understanding its effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader consequences for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefits. It is at odds with strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic ramifications of the proposal.

Overall, the inability to quantify tourism impacts, analyse the environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminates in a substantial evidential gap. This gap hinders a thorough assessment of economic implications and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant shortfall in meeting sustainable development criteria when evaluated against statutory obligations, national policy, and evidential requirements. It echoes the principal concerns that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Presenting the application under a more stringent policy framework, it fails to adequately address issues such as biodiversity, peatland safeguarding, landscape preservation, and community wellbeing.

There is a notable absence of a complete and reliable evidential basis for consideration of this application. Gaps in baseline data are critical, compounded by the continued reliance on an unspecified design envelope and mitigation measures that lack detail. Furthermore, key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have not been addressed. As a result, the Environmental Impact Assessment is incomplete, inhibiting a comprehensive understanding of potential significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties established under the Islands (Scotland) Act 2018. Additionally, the failure to provide a comprehensive Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct contradiction to National Planning Framework 4, the proposal fails to protect biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact analysis. The failure to properly assess the cumulative impact of both offshore and onshore components obscures the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially considerable. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The combination of substantial information deficiencies, conflicts with policy, and unresolved environmental risks inhibits a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or utilise the relevant regulatory mechanisms to require the submission of the outstanding information.

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

Additional Comments

I visit the hebrides as often as I can. The environment and the people who live here are very precious, and live marginal lives. The project does not even pretend to benefit the locality. I am a committed environmental worker, picking litter wherever I go. I notice thd impact people have in big and small ways on the plants and animals we share our planet with. The construction of this immense project will undoubtedly adversely affect the fragile environment.

Further, thd imposition of this is further insult to the people of the hebrides. For generations people and commercial interests from outside have selfishly taken resources and imposed pollution on the place. The project has reopened the generational sore. This grieves me on behalf of the dear kind generous people who live in Lewis and Harris.

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: C72A8CF4

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents. It highlights significant deficiencies in planning, environmental assessments, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project in relation to statutory obligations, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful decision. Important environmental data is absent, baseline information is inadequate and inconsistent, and key details of the proposal remain unspecified. The flexible design framework employed complicates understanding of potential significant impacts, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or insignificant effects that lack robust backing.

There are evident and serious policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the development's acceptability within policy frameworks.

This development's scale is unprecedented for the area, with large turbines proposed near the shoreline, raising significant issues about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on vague mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and unfit for lawful consideration. Given these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and does not offer a complete or reliable assessment of the likely environmental effects of the proposal. The

lack of commitment to specific turbine dimensions, layouts, or configurations, due to the use of a flexible Project Design Envelope, creates significant uncertainty. This compromises the integrity of the assessment and means that the impacts reported may not align with the actual development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought based on the assumption that environmental harm will be addressed later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This delay in providing crucial information until after consent is granted is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which stipulates that likely significant effects and mitigation must be clearly established prior to determination.

There are also significant evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are reported without strong supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot comply with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations about biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards exist.

In summary, the reliance on an unspecified design envelope, the absence of defined mitigation, and the gaps in baseline data render 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 information provided.

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 is fundamentally flawed and fails to provide a reliable understanding of the ecological receptors in the West Lewis coastal environment. This marine system is not only highly sensitive but also biologically active. Despite this, the baseline data is incomplete and the methodologies employed do not effectively capture species presence, behaviour, and habitat use, ultimately leading to an unreliable foundation for evaluating impacts.

A critical issue pertains to otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that potential effects stemming from construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such deficiencies undermine any conclusions about the absence of significant effects on otters.

Additionally, the assessment of basking sharks is similarly compromised. The reliance on aerial surveys introduces a significant bias in detection, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of relevant data in this regard leads to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings imply that any conclusions drawn about negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual scale of 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 it fails to properly identify or assess protected species. The uncertainties introduced by these deficiencies prevent the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, granting consent is not legally permissible.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions results in an unreliable assessment. These issues inhibit a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis threatens internationally important seabird populations, which are already experiencing declines. The ornithological assessment associated with the application is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that compromise its conclusions. It fails to adequately demonstrate that these species will not face adverse effects, particularly since the turbines are sited within key foraging areas and migratory pathways. The assessment lacks a robust evaluation of displacement, collision risk, or habitat loss, which is essential for understanding the potential impacts on these vulnerable birds.

Furthermore, the application presents a contradiction by asserting that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that its conclusions are not sufficiently supported by evidence. It does not convincingly demonstrate 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 acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like

Kittiwakes and Fulmars. Additionally, the methodologies applied likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not well understood.

The placement of turbines in a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term implications of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, fails to achieve the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and undermines a lawful conclusion in favour of consent. Additionally, the deficiencies identified 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.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is severely lacking and does not recognise this area as a vibrant cultural landscape. Here, environment, language, tradition, and community are deeply intertwined. Instead of acknowledging these connections, the application adopts a simplistic view, treating heritage merely as isolated, static assets without acknowledging their active social, cultural, and spiritual significance within the community.

Particularly troubling is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their ongoing use, meaning, and the implications of development on their settings. Consequently, the evaluation of cultural impacts remains incomplete, overlooking the vital role these sites play in community life.

Moreover, the assessment fails to consider intangible cultural heritage, including the Gaelic language, local traditions, and the long-standing relationship that the community has with the coastal environment. These elements are essential to the region's identity yet are entirely omitted from the assessment, constituting a significant gap. Without recognising these crucial factors, it is impossible to accurately gauge the

cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity recognised as characteristic of Indigenous Peoples; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and neglects the established principles for participation in decisions affecting cultural and environmental interests.

A major procedural failure in this context is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these deficiencies directly contravene the National Planning Framework 4, especially 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, clearly diverges from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory obligations create a significant evidential gap. The cultural impacts of the proposed development have not been adequately 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 developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report has not been made public. This situation creates a significant evidential gap that hinders both the public and the competent authority from fully understanding the social risks identified through the developer's own research. Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore based on real experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or given the weight they deserve. The lack of disclosure regarding the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment

process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. By failing to provide the complete dataset, the application does not offer a thorough evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avoid harm, yet the evidence currently available indicates adverse effects that have not been fully disclosed. Consequently, it cannot be established that compliance with this policy is met in the absence of the full assessment.

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

Overall, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This shortcoming prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a dominant industrial presence that fundamentally alters this character. This change would result in a permanent and irreversible transformation of the landscape.

The assessment of visual impacts is significantly lacking, failing to adequately capture the magnitude of visual change anticipated. The scale and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the qualities of naturalness and remoteness. This crucial aspect of the assessment is not sufficiently articulated, nor is its importance in the context of the sensitive landscape acknowledged.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence indicates that these viewpoints may not adequately encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been understated, thus compromising the reliability of the overall assessment.

Another significant gap is the 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, sharing visual and spatial relationships with the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The degree of change proposed is inconsistent with the need 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 compliance.

Moreover, the identified impacts cannot be effectively mitigated. The size, height, and proximity of the turbines would ensure their presence is dominant and inescapable. Consequently, the resulting change is not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, these deficiencies in the assessment lead to an inaccurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. Such shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current proposal is deficient in its assessment of construction and pollution risks, lacking the necessary detail to adequately evaluate the likely environmental effects. Notably, the application involves significant seabed preparation and installation activities 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 are to be formulated post-consent, thereby hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on undefined measures for future implementation is particularly troubling due to the sensitivity of the surrounding environment. The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. Although the application recognises risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail regarding the preventative, control, or monitoring measures that would be employed.

Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. The absence of robust modelling and clearly articulated management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty also applies to the possible effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing the establishment of contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to respond to any pollution incidents. This introduces procedural risks and compromises the capacity 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 stipulations of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation measures be evaluated prior to granting consent, and the absence of such information impedes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential environmental impacts renders the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks and strongly suggest that the application remains incomplete.

FISHERIES AND MARINE LIFE

The proposed development raises significant concerns regarding its effects on fisheries and marine life, particularly given the waters off the West Lewis coast, which host a vibrant marine ecosystem and a thriving fishing industry. The application fails to adequately evaluate the ecological and socio-economic impacts, leading to a worrying lack of clarity about how these vital marine uses and habitats will be protected from substantial disruption.

A critical flaw in the proposal is the assumption that fishing activities can be shifted without adverse effects. The absence of evidence regarding the availability of alternative fishing grounds that are accessible and capable of bearing additional pressure is alarming. This gap in the assessment is crucial, as it raises the spectre of overfishing in other locations, which could have broader economic repercussions for the local fishing fleet. Without a solid, evidence-based appraisal, the potential ramifications for fisheries and the livelihoods they support remain uncertain.

Moreover, the proposal poses considerable risks to marine species, especially due to

the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged duration is likely to disturb marine life over extensive areas, adversely affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is a grave issue that the application appears to minimise, lacking the necessary evidence to support such downplaying.

There is also a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is acknowledged, yet the impacts are simultaneously characterised as negligible. This contradiction severely undermines the credibility of the assessment and raises serious concerns about adherence to the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Furthermore, the assessment inadequately considers the cumulative impacts stemming from various pressures, including habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and local socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal aligns with the principles of sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and unreliable. Such shortcomings obstruct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of the project, treating offshore turbines and onshore infrastructure as separate entities, which obscures the overall environmental and socio-economic impacts. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve significant excavation in areas of deep peat, particularly within Barvas Moor. This location serves as a vital carbon store and an ecologically sensitive habitat. The assessment fails to provide a comprehensive analysis of the impacts associated with these activities, thereby limiting understanding of the project's complete environmental footprint.

By not addressing onshore impacts adequately, the application undermines the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined together; however, the distinct treatment of offshore and onshore elements results in an incomplete understanding of

the combined effects on peatlands, local habitats, and surrounding communities.

Moreover, there are substantial risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application lacks evidence that these habitats' impacts have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap regarding biodiversity protection.

Concerns also arise about the carbon balance linked to the proposal. Disturbance to peatland has the potential to release stored carbon, which could lead to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this aspect or prove 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 does not demonstrate that 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 as an integrated whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's credibility.

In summary, the disjointed evaluation of project components, the absence of a thorough assessment, and the lack of substantial evidence on environmental and land use impacts render this application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include any evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are important for environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that would be visible from long distances, creating a persistent and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

Moreover, the application fails to consider the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. The importance of dark skies for the area's identity and for growing tourism sectors like astro-tourism cannot be overstated. The lack of assessment creates a gap in the overall landscape and environmental evaluation.

There is also no assessment of how nocturnal wildlife may be affected. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly

sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not contain any lighting impact assessment or phototaxis study, failing to address how the aviation lighting may affect these species or contribute to increased mortality.

This issue is aggravated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and associated risks. Kittiwakes, for example, may forage or migrate at night and could also be disoriented by artificial lighting, yet this risk has not been evaluated. The absence of site-specific night-time data leads to a critical gap in understanding ecological effects.

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

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also weakens the overall assessment of landscape and seascape impacts, as the character of night-time environments is essential to the broader context.

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

TOURISM

The Isle of Lewis relies heavily on tourism, which has evolved into a vital component of its economy, growing from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while accounting for up to 16% of the local economy. However, the assessment of tourism impacts related to this application is materially deficient, as it neglects to evaluate the economic and social consequences for this key sector. The application acknowledges that 86% of visitors are attracted by the area's scenery, yet fails to provide a quantified assessment of how the introduction of large-scale offshore infrastructure might affect visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment does not consider the crucial role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies in enhancing the visitor experience. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding the impacts on burgeoning markets such as nature-based tourism and astro-tourism.

In an island community with limited economic diversification, this failure to properly assess tourism impacts has broader implications for employment, local businesses,

and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities 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 concerning economic impact and the necessity to show net benefits. It conflicts with strategic objectives that identify tourism as a priority growth sector, failing to provide sufficient evidence for the competent authority to assess the economic repercussions of the proposal.

The cumulative effect of not quantifying tourism impacts, neglecting environmental drivers of visitor behaviour, and overlooking the economic dependency of the island results in a significant evidential gap. This prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application presents issues similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application lacks the necessary evidential basis for determination.

Significant gaps in baseline data are present, and the application utilises an undefined design envelope. It relies on unspecified mitigation measures and omits critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of the likely significant effects or residual impacts.

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

Moreover, the proposal contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural places, and cultural heritage. It fails to 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 elements have not been sufficiently assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks posed by the project are uncertain and potentially significant. The 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 achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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, and the disruption of cultural and visual relationships would result in permanent effects on tourism 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, impede a lawful, evidence-based decision. Therefore, it is essential that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or require the submission of the outstanding information.

Additional Comments

I object to this proposal in specific terms because of the impact I believe the development will have on my daughter's family, my grandchildren and former neighbours. Our family home is in the area likely to be most affected. I believe that the development will negatively impact the tourism industry. I believe that the social impact of large developments which bring little in the way of stable jobs across the wage spectrum is highly destabilising to a small community. I lived in the Islands when the Arnish development was at its most productive. It bred a generation of young men who had become used to high wages and lifestyles that they could not hope to maintain within the islands. This increased behaviours such as alcohol and drug misuse and led to a general exodus of those whose training no longer fitted them to work locally. The influx of men from off island caused considerable problems within the community. There was little lasting benefit, but the social disbenefit was prolonged.

The onshore aspects of the wind farm will inevitably cause major disruption, pollution and impact fragile peatland habitats. The development will remove much of the peace and isolation that brings tourists to the islands and will therefore affect anyone who relies on the tourist trade.

I assume that the relevant agencies have been consulted and have commented on the shipping implications as this proposed development must be very close to the existing deep water shipping route. I have seen no discussion of the potential for the turbines to inhibit offshore rescue activities or oil spill recovery originating from shipping. As it has generally been policy to discourage major shipping from using the routes through the minches whenever possible, has an assessment been made of whether the presence of this development so close to the deep water route would lead to an increase in vessels using the minches channel?

On a more general note I feel strongly that before permission is given for a string of major generation projects there should be a clear, published, national strategic plan quantifying the country's generation needs, the capacity and upgrade requirements of the grid and other infrastructure. I believe that permission to exploit the country's communities and resources should not be given to companies controlled and run overseas and that the electricity generated should only be in line with that required by the national strategic plan. More consideration should be given to generation on brownfield sites and on a community scale and there should be a clear framework and requirement imposed on all developers to ensure that those most impacted by developments receive some form of compensation in terms of share profits, subsidised energy or other appropriate devices.

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: 0B99FF64

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 proposal raises significant concerns, particularly regarding its compatibility with statutory requirements, national policy, and sustainable development principles. It 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.

A critical issue with the application is its lack of an adequate evidential basis for lawful determination. The Environmental Impact Assessment Report and accompanying documents show that essential environmental data is missing, baseline information is limited and inconsistent, and important aspects of the proposal remain undefined. The flexible design framework employed prevents a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly assessed. Consequently, the documentation does not allow for a full understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are substantial policy conflicts evident in the application. 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 proposal fails to demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of the proposal introduces additional concerns, with large turbines positioned close to the shoreline raising issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy guidelines demonstrates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and does not deliver a complete, transparent, or reliable analysis of the potential environmental

consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to defined turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the application of a worst-case scenario. This deficiency undermines the assessment's integrity, resulting in a situation where the impacts outlined may not represent the actual development built. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

The application leans significantly on mitigation measures, monitoring strategies, and management plans that remain unspecified. Seeking consent under the assumption that environmental harm will be addressed later obstructs a meaningful evaluation of their effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined prior to determination.

There are also notable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such gaps lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without solid supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, introducing a scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not meet the evidential standards established 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 adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been thoroughly assessed or that suitable safeguards are in place.

When considered collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These flaws obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to reach a decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime regarding the assessment of alternatives. It does not offer a clear and reasoned comparison of realistic alternatives based on environmental effects. Instead, it presents a narrative of project evolution that does not prove that less harmful options have been adequately identified, evaluated, and preferred over more damaging solutions.

There is a significant lack of transparent, evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has properly considered placing turbines further offshore, which could likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact, the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging option.

Furthermore, the deficiencies also affect cable routing and landfall assessment. There is inadequate evidence that alternative routes have been sufficiently explored to avoid or lessen impacts on sensitive areas, including culturally and spiritually important sites like Barvas Cemetery. The failure to present a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

From a policy standpoint, this shortcoming undermines adherence to 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 conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, failing to deliver a thorough and dependable insight into the ecological receptors present in the West Lewis coastal environment. This area is known for its sensitivity and biological activity; however, the baseline information is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, or habitat utilisation. Consequently, the assessment does not furnish a solid evidential foundation for impact evaluation.

The assessment's shortcomings are particularly evident in its treatment of otters, a European Protected Species. The application inadequately acknowledges their active use of coastal zones for foraging and movement. By neglecting to consider their primary foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and increased human activity remain poorly assessed. This oversight diminishes the validity of any conclusions regarding significant effects on this species.

In addition, the assessment of basking sharks suffers from methodological flaws, notably the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underreport their presence, especially when compared to established land-based observations that indicate their frequent use of these waters. The disregard for such crucial data results in an incomplete baseline and compromises the reliability of the conclusions drawn.

These methodological issues lead to findings of negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of adequate baseline data hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a comprehensive evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings that fundamentally undermine its credibility. Key foraging areas and migratory pathways critical to the internationally important seabird populations along the west coast of the Isle of Lewis are not adequately addressed. Despite the development being located within these vital zones, the assessment fails to convincingly demonstrate, to the necessary evidential standard, that these species will not be adversely affected. The implications of potential displacement, collision risk, and habitat loss are insufficiently evaluated.

Moreover, a notable contradiction exists in the application, as the developer asserts there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically required only when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by solid evidence.

The assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is inadequately acknowledged, and the reliance on modelling methods creates further uncertainty, particularly for species already in severe decline,

like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor poses additional risks, effectively 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, along with potential impacts on species with relatively small global populations, are not properly assessed.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion that would support consent.

Furthermore, the deficiencies identified indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

In conclusion, the assessment is rendered unreliable by its internal inconsistencies, methodological flaws, and insufficient evidence. These issues inhibit a thorough evaluation of the impacts and culminate in the assertion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it overlooks the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply interconnected. The application simplifies heritage into separate, unchanging assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice; however, the assessment designates them as static elements, failing to recognise their continued relevance, meaning, and the potential impact of development on their surroundings. This misrepresentation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship that the community has with the coastal environment. These aspects are vital to the identity of the area, yet they are completely omitted from the assessment, which is a significant

oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity with traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to align with established principles of participation concerning cultural and environmental interests.

A significant procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic sites and landscapes. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear deviation from policy mandates.

Overall, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application falls short of providing a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Methodological concerns arise in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may fail to fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the true magnitude of visual impact has been understated, thus undermining the credibility of the assessment.

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

incomplete analysis of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure presents significant gaps and fails to fully recognise the interconnected nature of the project. The offshore turbines and onshore works should be considered as one integrated project; however, the separate evaluations obscure the true magnitude of environmental and socio-economic effects, resulting in a fragmented understanding.

Onshore activities encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These undertakings involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which hampers a comprehensive understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application limits the evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the division between offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain unclear.

There are also notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that these habitats have been thoroughly assessed or that suitable avoidance measures have been adopted. This evidential gap poses a threat to biodiversity protection.

Additionally, there are concerns about carbon balance due to the disturbance of peatland, which releases stored carbon and may lead to a carbon debt, counteracting the aims of renewable energy development. The application does not sufficiently tackle this concern or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with current land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, casting doubt on the project's feasibility and legality.

From a policy standpoint, the failure to assess the project in its entirety and demonstrate the protection of peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The lack of proof that impacts can be avoided or mitigated further weakens the application.

In summary, the disconnection of project components, absence of a comprehensive assessment, and lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application, hindering a lawful determination.

TOURISM

The application inadequately assesses tourism impacts and neglects to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. The area's tourism is fundamentally reliant on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenery, yet there is no quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle has seen notable 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. Despite this progress, the application fails to consider how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without such an evaluation, it remains unclear whether the proposed development would provide a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment overlooks the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a major gap in understanding the impacts on this acknowledged and growing component of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate impacts on tourism has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been duly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the

National Planning Framework 4, particularly concerning 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 assess the economic consequences of the proposal.

Overall, the lack of quantification of tourism impacts, failure to assess environmental influences on visitor behaviour, and disregard for the island's economic dependence culminate in a significant evidential gap. This deficiency 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 fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. It raises the same fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This application is now presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for decision-making is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and it relies on unspecified mitigation measures. Furthermore, key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks the completeness needed to fully understand the likely significant effects or any residual impacts.

There are also serious procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a material omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that the health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is no tourism impact modelling included. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion regarding

the acceptability of impacts.

The proposed project would lead to substantial and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, leading to permanent effects that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or utilise the necessary regulatory provisions to demand the submission of the missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is completely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D64BEA37

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. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. The scale, proximity, and design of the wind farm raise serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The flexible design framework inhibits a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a complete or informed understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts directly challenge the statutory tests needed for consent and hinder the competent authority's ability to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary depth and transparency, failing to provide a reliable overview of the potential environmental consequences of the proposal. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the assessment introduces substantial uncertainty. This lack of clarity undermines the integrity of the evaluation and obscures the actual impacts of the development, leaving both the public and the competent authority unable to fully grasp the environmental effects involved.

Consent for the application has been requested based on the understanding that environmental harm will be mitigated at a later stage, which compromises any meaningful assessment of the effectiveness of these measures and the residual impacts that may arise. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are thoroughly established before a decision is made.

There are considerable deficiencies in the evidential basis, including notable gaps in baseline data, limitations in the employed methodology, and an overreliance on assumptions instead of site-specific evidence. Consequently, this generates uncertainty regarding the scale and significance of impacts, particularly where the report presents conclusions of negligible or non-significant effects without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case scenarios and introduces a level of scientific uncertainty that cannot comply with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of 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, particularly in relation to biodiversity protection and environmental integrity, since it cannot be evidenced that impacts have been adequately assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data lead to an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, ultimately leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks comprehensiveness and reliability within the West Lewis coastal environment. This region is known for its biological activity and sensitivity, yet the methodologies

employed are inadequate in capturing essential aspects such as species presence, behaviour, and habitat use. Consequently, the baseline data is incomplete, failing to provide a solid foundation for assessing potential impacts.

One significant oversight is the failure to properly evaluate otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their usage of coastal areas for foraging and movement. As a result, the assessment overlooks the core foraging range and behavioural patterns of otters, leaving the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This gap in analysis undermines the conclusions regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduces considerable detection bias, especially in Atlantic conditions. This methodological choice is likely to result in an underestimation of their presence, particularly when compared to established land-based observations that indicate a frequent occurrence in these waters. The failure to include or adequately consider such critical data further weakens the reliability of the conclusions drawn.

The methodological shortcomings mean that claims of negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of sufficient baseline data also hinders the ability to assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the understanding of the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not appropriately identified or assessed protected species. The level of uncertainty introduced prohibits the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, granting consent would not be legally justified.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an assessment that lacks reliability. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species and affirm that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application concerning the potential impacts on ornithological interests is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations located on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. The

placement of turbines within key foraging areas and migratory pathways has not been adequately evaluated, particularly regarding the risks of displacement, collision, and habitat loss.

A critical inconsistency arises within the application where the developer asserts that no significant adverse effects will occur while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, indicating that the conclusions drawn are not supported by the underlying evidence.

The evidence provided does not sufficiently assure that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling approaches introduces uncertainty, especially for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given incomplete baseline data and an inadequate understanding of behavioural responses.

Furthermore, situating turbines within a recognised migratory corridor presents an additional substantial risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term consequences of sustained mortality in this corridor or the potential impacts on species that possess relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, compounded by data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

These deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted places the proposal directly at odds with national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and insufficient 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 community identity and cultural heritage is fundamentally lacking, particularly in its failure to recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are deeply

intertwined. Rather than appreciating the ongoing social, cultural, and spiritual significance of heritage, the application adopts a reductive perspective, viewing it merely as a collection of isolated and static features.

A notable shortcoming in the assessment is the handling of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites function as active burial grounds and centres of spiritual practice; however, the evaluation treats them as unchanging elements, neglecting their contemporary use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, failing to acknowledge the cemeteries' role within the life of the community.

Additionally, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These aspects are vital to the area's identity and are conspicuously absent from the assessment, representing a critical omission. Consequently, the true cultural ramifications of the development cannot be accurately assessed without addressing these factors.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community, which possesses a unique cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions impacting cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018, represents a significant procedural lapse. Without this assessment, the competent authority cannot fulfil its statutory obligation to evaluate the social, cultural, and economic consequences for the island community, thereby hindering a lawful determination.

From a policy standpoint, these inadequacies place the proposed development at odds with National Planning Framework 4, particularly concerning the preservation of historic sites and assets. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, constitutes a clear deviation from policy directives.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the proposed development remain inadequately evaluated, and the application does not furnish a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is significantly lacking in transparency and therefore cannot meet lawful evaluation standards. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This omission creates a substantial evidential gap, hindering both public understanding and that of the competent authority regarding the social risks outlined in the developer's own research.

Residents are reportedly facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development. These findings arise from direct engagement and are firmly grounded in evidence. Nonetheless, the failure to release the complete assessment restricts thorough scrutiny of its findings, which limits the ability to evaluate their significance in the decision-making process.

Furthermore, the proposal is viewed by many as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite these serious implications, they have not been adequately integrated into the main application or assigned appropriate weight. The non-disclosure of the full Social Impact Assessment thus conceals the true human and social costs involved in the development.

This lack of transparency critically undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, particularly where community character and functioning may be compromised. The application, by failing to provide the complete dataset, does not present a thorough evidential foundation needed for assessing the balance between potential benefits and harms.

In terms of policy compliance, the application falls short of demonstrating alignment with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes while avoiding detrimental effects, yet available evidence points to existing adverse impacts that have not been fully disclosed. Without the complete assessment, the claim of compliance with this policy remains unsubstantiated.

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

When considered collectively, the non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts results in an incomplete and unreliable assessment. This lack of information precludes a lawful determination and supports the conclusion that the application lacks sufficient data.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, landscape, and seascape is significantly lacking, failing to accurately capture the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon and its undeveloped nature, which contributes to a strong sense of remoteness. The planned large-scale turbines, situated close to the shoreline, would impose a continuous industrial presence, fundamentally altering this unique character and leading to a permanent transformation of the landscape.

The visual change represented in the application is not sufficiently detailed. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic locations, and popular coastal sites. This dominance would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This limitation raises the possibility that the visual impact has been understated, thus questioning the reliability of the assessment.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage adequately. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape, sharing visual and spatial connections to the Atlantic horizon. The assessment fails to consider these sites as interdependent assets, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape threatens to sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This issue is not limited to visual impacts but also encompasses broader cultural and spatial damages, which the application has not properly addressed.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural spaces and historic assets. The proposed scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further challenges any claims of policy adherence.

Ultimately, the impacts identified are not capable of being effectively mitigated. Due to the turbines' scale, height, and proximity, their presence will be dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, beyond the possibility of being lessened to acceptable levels through mitigation efforts.

In conclusion, the assessment does not accurately depict the scale of the impact, the

sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are essential for evaluating potential environmental effects. It entails extensive seabed preparation and installation activities within a high-energy Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead proposes to rely on mitigation and contingency measures that would be formulated after consent, which hinders any substantial assessment of their sufficiency or effectiveness.

This reliance on unspecified future measures is alarming, particularly in light of the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer adequate detail on methods for prevention, control, or monitoring of these risks.

Moreover, there remains uncertainty regarding the scale and dynamics of sediment plumes generated from seabed disturbance and cable installation. In the absence of rigorous modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty extends to possible effects on marine species and habitats already identified as sensitive within the broader assessment.

The lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether suitable safeguards are available to address pollution incidents. This situation not only introduces procedural risk but also undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to granting consent, and the absence of such information renders any lawful determination impossible. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts renders the assessment materially inadequate. These inadequacies obstruct a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment provided regarding fisheries and marine life lacks thoroughness and fails to deliver a strong evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these crucial habitats and uses can be safeguarded or sustained without causing significant disruption.

One primary concern lies in the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to absorb additional pressure. This omission is crucial, as the potential for displacement raises the risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. An evidence-based assessment is essential to fully understand the impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling planned over an extended period is expected to disturb marine life over large areas, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

Additionally, there is a striking inconsistency in the application concerning the necessity for licences to permit harm to European Protected Species, even as such impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises substantial concerns regarding adherence to the Habitats Regulations, particularly where harm is expected to occur to a degree that requires legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is fundamentally flawed, as it fails to evaluate onshore infrastructure in conjunction with offshore elements, resulting in a fragmented analysis that conceals the true magnitude of environmental and socio-economic repercussions. The offshore turbines are interconnected with onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and access routes across sensitive landscapes. These onshore activities involve excavation in areas of deep peat, notably within Barvas Moor, an essential carbon store and ecologically significant habitat. The absence of a thorough examination of these impacts hinders a complete understanding of the project's environmental footprint.

The lack of a unified assessment of both onshore and offshore impacts leads to an inadequate evaluation of cumulative effects, violating the Environmental Impact Assessment process, which mandates consideration of all project components as a whole. Consequently, the combined impacts on peatlands, habitats, and local communities remain insufficiently understood. Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The proposal does not adequately demonstrate that the potential impacts on these habitats have been thoroughly evaluated or that effective avoidance measures have been implemented, revealing a significant evidential gap regarding biodiversity protection.

Concerns also arise surrounding carbon balance, as the disturbance of peatland may release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application fails to address this critical issue or prove that the overall carbon balance is favourable. Moreover, routing infrastructure through active croft land raises potential conflicts with established land use and legal rights, with the application lacking evidence that necessary consents or processes have been initiated, raising serious questions about its feasibility and compliance with legal requirements.

From a policy standpoint, the application's failure to assess the project comprehensively and to ensure the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that the impacts can be avoided or mitigated further weakens the application. Collectively, the disjointed nature of the project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this part of the application both incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

create an intrusive “wall of light” effect that fundamentally alters the night-time environment.

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

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

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

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

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

TOURISM

The assessment of tourism impacts associated with the proposed development is fundamentally inadequate, particularly regarding its implications for a critical component of the Isle of Lewis economy. Tourism relies heavily on the area's natural attributes, including its wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. The application acknowledges that a substantial 86% of visitors are attracted by the scenic beauty; however, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has seen considerable growth, with revenues increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for approximately 16% of the island's economy. Despite this positive trend, the application neglects to model the potential impact of the industrialisation of the seascape and the consequent degradation of environmental quality on Tourism Gross Value Added and broader economic resilience. Without a thorough analysis, it remains unclear whether the proposed development would yield a net economic benefit or harm an already established and expanding sector.

Additionally, the assessment overlooks the vital role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for the visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a notable gap in understanding the potential impacts on this recognised and growing segment of the local economy. In a context where the island community faces limited economic diversification, this failure to evaluate tourism impacts has far-reaching consequences for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been adequately addressed, contrary to the requirements set forth under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not sufficiently demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate a net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector and fails to provide the necessary evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and considering the island's economic dependencies culminate in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal 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 object to N4.

The Government is attempting to industrialise an internationally significant cultural and ecological landscape without demonstrating social licence or meaningful democratic consent from the affected community.

The issue is whether the Scottish Government can lawfully, ethically, and democratically justify the irreversible industrialisation of one of the most ecologically

and culturally significant land and marine landscapes in the British Isles in the face of public health issues, biodiversity concerns, and overwhelming local opposition from an indigenous community that is officially indigenous, according to guidelines produced by the UN (included in point 5.)

Approving a 900MW offshore wind farm at the most transmission-remote location in Scotland, before grid infrastructure exists to carry its output, does not serve the public interest.

1.) The Impact on Disabled People.

I live in Shawbost with my husband and son.

Our son has Type 1 Diabetes and is neurodiverse.

He is not able to physically function around stimulants such as loud noises, continuous noises, or bright lights.

His blood sugars often drop or rise without warning, which requires him to take immediate action to stabilize his blood sugar.

If he is not able to physically function, he is unable to respond to the fluctuations in his blood sugar.

My son's life depends on his ability to function.

My son is autistic and experiences significant sensory sensitivity. The scale of industrial lighting, movement, construction activity, and noise associated with this development would have a disproportionate impact on his wellbeing, regulation, and ability to safely remain within his home environment.

The N4 Development would have an incredible damaging emotional and physical impact on our family, and all the residents of the west coast of Lewis.

It would be unbearable.

Is our son's life worth less to you than this development? Is the quality of life for all the residents here worth less than this atrocity?

I am deeply concerned that the needs of disabled residents, including autistic people, have not been adequately considered within the consultation and assessment process. Public authorities have duties under the Equality Act 2010 and the Public Sector Equality Duty to properly consider the disproportionate effects of decisions on disabled people.

2.) Public Health & Safety Concerns.

Wind Turbines that are close to human populations are proven to lead to chronic health conditions.

<https://windwisema.org/about/noise/wind-turbine-syndrome-and-vibroacoustic-disease>

3.) Risks to the marine environments of Scotland, which the Scottish Government has committed to protect, and to the Waters of the Hebrides, which are a protected area. The waters surrounding Lewis and the Outer Hebrides are internationally recognised as among the richest areas for marine mammal diversity in the British Isles, supporting whales, dolphins, porpoises, seals, seabirds, and protected marine ecosystems.

<https://www.marinemammalhabitat.org/factsheets/minches-and-the-sea-of-the-hebrides-imma>

<https://www.gov.scot/news/safeguarding-scotlands-marine-environment/>

<https://www.gov.scot/news/protecting-scotlands-marine-environment/>

<https://www.marinemammalhabitat.org/factsheets/minches-and-the-sea-of-the->

[hebrides-imma](#)

The Scottish Government has repeatedly stated its commitment to safeguarding Scotland's marine environment and protecting biodiversity.

Peer-reviewed and governmental research has identified potential impacts of offshore wind developments on whales, dolphins, fish, seabirds, and marine ecosystems through underwater noise, habitat displacement, cable electromagnetic fields, vessel traffic, sediment disturbance, and cumulative ecosystem disruption.

Peer-reviewed research has repeatedly identified significant risks from offshore wind developments to seabirds, marine mammals, ecosystem structure, migratory behaviour, and marine food webs. Multiple studies have found habitat displacement extending kilometres beyond turbine footprints, while major review papers acknowledge substantial remaining scientific uncertainty regarding cumulative ecological impacts.

4.) Risks to seabird life

-Nature Charities are against other offshore wind farms because of the impact on local seabird populations.

<https://www.seabird.org/press-releases/nature-charities-call-for-proposed-mega-offshore-windfarm-to-be-refused>

5.) Indigenous Rights & Cultural Appropriation

The N4 Development is appropriating the Gaelic language to call N4 “Spiorad na Mara” – as if this is some sort of collaboration with the local people. It is NOT.

According to a recent poll in our community carried out by Eilean Mo Ghaoil,

<https://www.emg-lewis.co.uk/>, our community is 88% AGAINST N4.

This is pure appropriation for mega corporations, from different places and different cultures, to come across the sea and use our language against us.

International human rights principles — including those reflected within the United Nations Declaration on the Rights of Indigenous Peoples — emphasise the importance of protecting culturally significant lands, ensuring meaningful participation in decisions affecting traditional territories, and preventing the erasure or commodification of minority cultures through externally imposed development.

The Isle of Lewis is not an empty industrial zone. It is a living cultural landscape in which language, memory, burial grounds, ecology, crofting traditions, and identity remain inseparable from the land itself.

Proceeding with large-scale industrial transformation in the face of substantial community opposition risks repeating a historic pattern in which peripheral Gaelic communities bear the burden of national economic priorities while their cultural relationship to land is treated as secondary to extraction and infrastructure.

The question is not simply whether this project is technically possible. The question is whether a democratic society committed to cultural protection, equality, environmental justice, and human rights should permit industrial development to override the clearly expressed concerns of a culturally distinct community whose heritage and identity are directly tied to the affected landscape.

At minimum, this demands the highest possible standard of scrutiny, consultation, cultural impact assessment, and community consent.

When 88% of the community is against the N4 Development, the case is easily made that the company did NOT obtain proper community consent.

According to the United Nations, the people of the Isle of Lewis are an indigenous nation, whether they are officially recognised by the government of the United Kingdom or not.

https://www.un.org/esa/socdev/unpfii/documents/5session_factsheet1.pdf .

“Who are indigenous peoples? It is estimated that there are more than 370 million indigenous people spread across 70 countries worldwide. Practicing unique traditions, they retain social, cultural, economic and political characteristics that are distinct from those of the dominant societies in which they live. Spread across the world from the Arctic to the South Pacific, they are the descendants - according to a common definition - of those who inhabited a country or a geographical region at the time when people of different cultures or ethnic origins arrived. The new arrivals later became dominant through conquest, occupation, settlement or other means...

Understanding the term “indigenous”

Considering the diversity of indigenous peoples, an official definition of “indigenous” has not been adopted by any UN-system body. Instead the system has developed a modern understanding of this term based on the following: • Self-identification as indigenous peoples at the individual level and accepted by the community as their member. • Historical continuity with pre-colonial and/or pre-settler societies • Strong link to territories and surrounding natural resources • Distinct social, economic or political systems • Distinct language, culture and beliefs • Form non-dominant groups of society • Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities. A question of identity • According to the UN the most fruitful approach is to identify, rather than define indigenous peoples. This is based on the fundamental criterion of self-identification as underlined in a number of human rights documents. •

The term “indigenous” has prevailed as a generic term for many years. In some countries, there may be preference for other terms including tribes, first peoples/nations, aboriginals, ethnic groups, adivasi, janajati. Occupational and geographical terms like hunter-gatherers, nomads, peasants, hill people, etc., also exist and for all practical purposes can be used interchangeably with “indigenous peoples”. • In many cases, the notion of being termed “indigenous” has negative connotations and some people may choose not to reveal or define their origin. Others must respect such choices, while at the same time working against the discrimination of indigenous peoples. Culture and Knowledge Indigenous peoples are the holders of unique languages, knowledge systems and beliefs and possess invaluable knowledge of practices for the sustainable management of natural resources. They have a special relation to and use of their traditional land. Their ancestral land has a fundamental importance for their collective physical and cultural survival as peoples. Indigenous peoples hold their own diverse concepts of development, based on their traditional values, visions, needs and priorities. Political participation Indigenous peoples often have much in common with other neglected segments of societies, i.e. lack of political representation and participation, economic marginalization and poverty, lack of access

to social services and discrimination. Despite their cultural differences, the diverse indigenous peoples share common problems also related to the protection of their rights. They strive for recognition of their identities, their ways of life and their right to traditional lands, territories and natural resources.”

6.) Housing prices are estimated to drop 8-10% if N4 goes forward.

In many places impacted by wind turbine developments, people are unable to get mortgages, or to remortgage their property.

7.) The proposal is incompatible with Scotland’s peatland protection and climate obligations

The proposed onshore infrastructure — including substations, access routes, cable corridors, construction compounds, and peat management areas — will affect peatland environments that are nationally and internationally significant carbon stores. Scottish Government policy recognises peatlands as critical natural carbon sinks and states that disturbance of deep peat can release substantial stored carbon into the atmosphere, undermining national climate objectives.

The Highlands and Islands contain some of the most important peatland systems in Europe. Once damaged, peat ecosystems can take decades or centuries to recover, and restoration cannot guarantee full recovery of lost carbon function or biodiversity.

8.) The full embedded carbon cost of the proposed development has not been adequately addressed.

9.) Large-scale offshore wind infrastructure is not carbon-neutral at the point of construction. Significant emissions are generated through:

peat excavation and disturbance,
concrete production,
steel manufacture,
subsea cabling,
blasting and seabed preparation,
marine construction activity,
heavy vessel use,
and long-distance transmission infrastructure.

Disturbance of peatland is particularly concerning, as peat functions as a long-term carbon store. Once damaged or excavated, stored carbon can be released into the atmosphere, while ecosystem recovery may take decades or longer.

In circumstances where northern Scottish wind generation is already routinely curtailed due to transmission constraints, it is unclear whether the full lifecycle carbon costs of constructing and connecting this development have been transparently weighed against its claimed climate benefits.

The Scottish Ministers must therefore demonstrate:

the project’s true lifecycle carbon balance,
the projected carbon payback period,
and how permanent disturbance to carbon-rich peatland and marine environments is consistent with Scotland’s climate and biodiversity obligations.

Climate policy cannot credibly rely upon the industrial disturbance of major natural carbon sinks without rigorous and transparent accounting of the resulting emissions and ecological damage.

10. The public interest test cannot be satisfied while the grid is critically constrained
In 2025, Scottish wind generators were paid approximately £343 million to reduce

output — 94% of Great Britain's total curtailment costs — because the transmission network cannot carry the electricity already being generated in northern Scotland. Only 61% of wind power that could have been generated in northern Scotland in 2025 was delivered to the grid. The remainder was switched off.

Constraint costs reached £1.9 billion in 2024/25, representing 71% of GB's entire balancing bill. These costs are passed directly to consumers.

The proposed Western Isles HVDC link — without which N4 electricity cannot reach demand centres — has no confirmed consent, no confirmed funding, and no confirmed delivery date.

Approving a 900MW offshore wind farm at the most transmission-remote location in Scotland, before grid infrastructure exists to carry its output, does not serve the public interest. It transfers corporate risk onto the landscape of Lewis and onto British bill-payers.

The Scottish Ministers cannot satisfy the public interest requirement of Section 36 of the Electricity Act 1989 on the basis of a project that will foreseeably be paid to not generate electricity for years after commissioning.

11. Crofting law has not been adequately addressed — onshore development cannot proceed without Land Court consent

The onshore infrastructure required by this project — substations, cable routes, peat management zones — crosses land held under crofting tenure.

Any development on croft land or common grazing requires either resumption (removing land from crofting tenure via the Scottish Land Court) or a Section 19A scheme for development under the Crofters (Scotland) Act 1993, which itself requires Land Court approval.

The EIA and consenting documents have not adequately addressed this legal requirement. The Crofting Commission has not been listed as a statutory consultee, despite its clear relevance.

The unanimous refusal by the local grazings committee to grant access even for a meteorological mast demonstrates that community consent — which crofting law requires — is absent.

This is not a planning matter the Scottish Ministers can override. It is a matter of established Scots property law, enforceable in the Land Court independently of any Section 36 consent.

12. The environmental assessment is inadequate for a site of this ecological sensitivity
The proposed site lies in waters with internationally significant populations of cetaceans, seabirds (including internationally protected species), and migratory fish. The west coast of Lewis is among the most ecologically rich inshore marine environments in the British Isles.

The Scottish Government's own Strategic Environmental Assessment for this site recorded: "There is potential for significant effects on population (noise impacts), navigational safety and visual effects."

Up to 60 turbines at heights of up to 338 metres above sea level, placed 5–13km from shore, will produce underwater noise during construction and operation at a scale incompatible with cetacean habitat protection obligations under the Habitats Regulations.

The EIA scope does not adequately account for cumulative impacts alongside other ScotWind developments proposed for Scottish waters.

The proximity of the Flannan Isles — a protected seabird colony — requires independent ecological assessment that has not been undertaken to sufficient standard.

The socioeconomic assessment has explicitly excluded consideration of Sunday observance, Gaelic cultural heritage, traditional crofting and fishing practices, ferry and service capacity, and community wellbeing — all of which will be materially affected during a multi-year construction phase.

13. The cultural, linguistic, and community impact has been systematically underweighted

The west coast of Lewis is the heartland of the Gaelic language and culture in Scotland. It is not simply a scenic asset — it is a living linguistic landscape, the fabric within which a minority language and its associated way of life survive.

The visual industrialisation of this coastline — with turbines up to 338 metres tall visible from land, from sea, and from culturally significant sites including the Callanish Standing Stones — constitutes an irreversible alteration to a landscape of international cultural importance.

The community benefit consultation process has been inadequate and has not obtained free, prior, and informed consent from the communities most directly affected. Community councils and grazings committees have not been treated as meaningful decision-making partners.

The comparison with the Viking Wind Farm on Shetland — where the community stake initially projected to generate £20 million annually was reduced to approximately £2.2 million per year (£95 per islander) — demonstrates the gap between promised and delivered community benefit in island wind developments.

The tourism economy of Lewis, which depends directly on the unspoiled character of the west coast landscape, has not been given adequate weight in socioeconomic modelling.

14.) A dark sky festival is hosted in Stornoway. The sky of the Isle of Lewis should be protected as a dark sky sanctuary - not polluted with the nonstop, 24 hour lights of wind turbines.

15.) The microplastics emitted by wind turbines are indefensible from a green energy point of view.

16.) The noise, light, microplastic, and physical pollution of such a project is indefensible.

17.) The consenting process itself has procedural failings

- The application uses Section 57 of the Town and Country Planning (Scotland) Act 1997 via a single Section 36 consent, which reduces democratic transparency for onshore elements that would otherwise require separate local authority planning permission.
- Onshore and offshore infrastructure should be consented separately — the offshore application to Marine Scotland, the onshore application to Comhairle nan Eilean Siar — to ensure proper public scrutiny at each stage.
- The application was lodged before public consultation on onshore proposals was complete, and before a second round of consultation events (planned for June 2025) had taken place.

18.) Along with 88% of the local community, I oppose the N4 wind development.

I oppose this project, in this location, at this time, without the transmission

infrastructure, the community consent, the ecological rigour, or the legal compliance that would make it defensible. Scotland's energy transition must not be built on the sacrifice of its most culturally and ecologically irreplaceable places, or on the backs of communities who were never genuinely asked.

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: F2C16F5D

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. The scale, design, and proximity of the development raise essential issues concerning its alignment with statutory obligations, national policy directives, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful assessment. Important environmental data is absent, baseline information is either limited or inconsistent, and numerous critical aspects of the proposal remain undefined. The proposal's flexible design framework obscures a clear understanding of the potential significant effects, and reliance on unspecified mitigation measures means their anticipated effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are evident and substantial conflicts with policy frameworks. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate that it can fulfil national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly challenge the statutory requirements for consent and hinder the competent authority's ability to determine the development's policy acceptability.

The unprecedented scale of the proposal, involving the installation of large turbines in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle is applicable.

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 within the West Lewis coastal environment is significantly inadequate, failing to offer a complete or reliable understanding of the ecological receptors present. This area is characterised as a biologically active and highly sensitive marine system, yet the baseline data collected is insufficient, and the methodologies employed do not effectively capture species

presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal zones for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an incomplete assessment of the possible effects of construction disturbance, noise, and heightened activity, thereby undermining any conclusions that suggest no significant effects on this species.

In addition, the evaluation of basking sharks is flawed, as it relies on aerial surveys that introduce significant detection bias, especially under Atlantic weather conditions. This methodology is prone to underestimating the presence of basking sharks, particularly when compared to established land-based observations that indicate their frequent usage of these waters. The neglect to incorporate or appropriately consider such data results in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects that rest on assumptions rather than substantial evidence. The lack of adequate baseline data also obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the true extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or those of National Planning Framework 4, as there has been insufficient identification or evaluation of protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unfounded conclusions renders the assessment unreliable. These issues inhibit a thorough evaluation of impacts on marine ecology and protected species, supporting the overall assertion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application contains significant deficiencies that compromise its reliability, stemming from internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. Notably, the application does not meet the required evidential standard to demonstrate that internationally important seabird populations, particularly those associated with protected sites such as the Lewis Peatlands and St Kilda, will not be adversely affected. The assessment overlooks the importance of these feeding grounds and relies on modelling approaches that introduce uncertainty, especially for declining species like Kittiwakes and Fulmars. Furthermore, there is a

fundamental contradiction in the developer's conclusions, as they assert no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated.

The site for the development is situated within key foraging areas and migratory pathways, yet the assessment inadequately evaluates the implications of displacement, collision risk, and habitat loss. The placement of turbines within a recognised migratory corridor raises additional concerns, as it poses a significant risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of potential sustained mortality in this corridor have not been adequately addressed, particularly for species with relatively small global populations.

From a regulatory standpoint, the application fails to satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in the modelling process indicates that the necessary standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Moreover, the identified deficiencies represent non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that important seabird populations will not face adverse effects places the proposal in direct conflict with national policy. Collectively, these factors culminate in a conclusion that the assessment is unreliable and that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity along the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these relationships, the application takes a reductive approach, viewing heritage as isolated and static rather than dynamic and socially significant.

The treatment of important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, highlights a significant deficiency. These cemeteries serve as active places of burial and spiritual practice, yet the assessment treats them as fixed features. It overlooks their ongoing use and the development's impact on their surroundings, leading to an incomplete evaluation of cultural effects and neglecting their importance in community life.

Additionally, the assessment does not consider intangible cultural heritage, such as the Gaelic language and the traditions that reflect the community's long-standing relationship with the coastal environment. These aspects are essential to the area's identity, yet they are notably absent from the evaluation, indicating a critical omission that hinders a proper understanding of the development's cultural impact.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity that aligns with Indigenous characteristics, has not been included in a Free, Prior and Informed Consent process. This lack of meaningful engagement undermines the assessment's credibility and disregards established participation principles in decisions affecting cultural and environmental interests.

Moreover, a vital procedural failure is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear violation of policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application lacks a solid foundation for assessing the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

The proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be affected. Without the full dataset, the application does not provide a comprehensive basis for weighing the benefits against potential harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts presented in the application is severely lacking, failing to adequately address both the extent of changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline, characterised by an open Atlantic horizon and a sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines situated near the shoreline. This would create a pervasive industrial presence that would lead to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately captures the scale of visual change that would result from the turbines. Their size and proximity would lead to domination of views from residential areas, historic sites, and prominent coastal locations, thereby negatively affecting visual amenity and undermining the defining characteristics of naturalness and remoteness. The assessment lacks an accurate portrayal of the impacts and their significance within this sensitive landscape context.

Concerns also arise from the methodologies employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not effectively depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been understated, which diminishes the reliability of the assessment.

Moreover, there is a failure to consider the interconnected relationships between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that shares visual and spatial connections with the Atlantic horizon. The assessment treats these heritage assets as separate entities, neglecting their interdependence, which leads to an incomplete evaluation of the impact on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are perceived and severing their connections to the natural horizon. This situation represents not only a visual detriment but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, which mandates the protection of natural environments and historic assets. The extent of the proposed changes is incompatible with the obligation to maintain landscape character, visual amenity, and the context surrounding culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the alterations to the landscape would be fundamental and permanent, rather than something that could be sufficiently addressed through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided with the application. Instead, it relies on mitigation and contingency measures that are to be prepared post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline is known for its clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. While 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.

Additionally, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to

potential effects on marine species and habitats already identified as sensitive in the wider assessment.

The absence of detailed emergency response procedures further exacerbates these issues. By deferring contingency planning until after consent, the application undermines the ability to evaluate whether appropriate safeguards are in place to respond to pollution events, introducing procedural risk that hinders the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be made. The application also fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts lead to a materially deficient assessment. These shortcomings hinder a robust evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of marine life and fisheries. There is an inadequate evaluation of the ecological and socio-economic effects related to the waters off the West Lewis coast, which are home to a diverse marine ecosystem and a thriving fishing industry. This assessment does not adequately address whether these habitats and activities can be safeguarded from disruption.

A major concern lies in the assumption that displacing fishing activity will not have adverse effects. The application fails to provide evidence that alternative fishing grounds are available and can handle the increased pressure. This lack of information is crucial, as the potential for overfishing in other areas could threaten the local fishing fleet's economic viability. Without a thorough and evidence-based evaluation, the impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The anticipated use of high-energy hammer piling over a prolonged period is likely to disturb marine life across extensive areas, which includes species such as dolphins. The potential disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these impacts without adequate justification.

There is a notable inconsistency within the application, acknowledging the need for licences to permit harm to European Protected Species while simultaneously declaring

the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal approval.

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

From a policy standpoint, the application fails to demonstrate 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 mitigate unacceptable impacts on marine biodiversity, which undermines any assertion that the proposal aligns with the principles of sustainable development.

Overall, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application result in an incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The project involves significant onshore infrastructure, which has been inadequately assessed, leading to an incomplete understanding of the impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are closely interrelated; however, their separate assessments create a disjointed approach that fails to capture the full scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a vital carbon store and ecologically important habitat. The application does not provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or delaying the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively, yet the distinct separation of offshore and onshore components means the overall effects on peatlands, habitats, and communities remain unclear.

There are notable risks to sensitive habitats, including machair systems and peatland environments that receive policy protection. The application fails to illustrate that impacts on these habitats have been fully appraised or that suitable avoidance measures have been enacted, thus creating a significant evidential gap in terms of biodiversity protection.

Concerns are also raised regarding the project's carbon balance. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts renewable energy development objectives. The application does not sufficiently address this concern or demonstrate that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence indicating that the necessary consents or procedures have been initiated, which brings into question the feasibility and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project as a cohesive entity and to show adequate protection for 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 weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an evaluation of dark skies and nocturnal wildlife, which represents a significant oversight. The coastline of West Lewis features exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

The application fails to consider how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly important given the significance of dark skies to the area’s identity and the growth of tourism sectors such as astro-tourism. As a result, there is a substantial gap in the overall landscape and environmental assessment.

More importantly, the proposal does not assess the effects of this lighting on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, are sensitive to artificial light due to phototaxis, which can cause disorientation and raise collision risks. The absence of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species or the risk of increased mortality are not evaluated.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not adequately reflect nocturnal activity and its associated risks. Species like Kittiwakes that may forage or migrate at night are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. Without site-

specific night-time data, there is a crucial gap in understanding the ecological impacts.

Determining whether protected species or designated sites could be negatively affected is impossible without an assessment of nocturnal impacts. The application does not meet the evidential standard required to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also weakens the comprehensive assessment of landscape and seascape impacts since the character of night-time environments is a critical component of the ecosystem.

In summary, the lack of an assessment regarding dark skies and nocturnal wildlife constitutes a major evidential gap. The absence of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unable to support a lawful determination.

TOURISM

The evaluation of tourism impacts presented in the application is severely lacking and does not adequately address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contributions they make.

Tourism on the island has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nonetheless, the application neglects to assess how the industrialisation of the seascape and any resultant decline in environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would yield a net economic advantage or jeopardise an established and burgeoning sector.

The assessment also overlooks the significance of environmental quality in promoting tourism, including the value of unspoiled landscapes and dark skies to the visitor experience. This is especially relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given that this is an island community with limited economic diversification, the failure to evaluate the impacts on tourism extends to broader concerns regarding employment, local businesses, and the sustainability of the community. The omission

of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly examined, as required under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory obligations, national policies, and evidential standards. This application echoes the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains insufficient.

The application lacks a comprehensive and reliable evidential foundation for decision-making. Significant gaps in baseline data persist, accompanied by the use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of critical impact pathways such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

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

The proposal conflicts with National Planning Framework 4, as it does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components

has not been adequately conducted, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties and potential risks to the environment. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent on these bases or invoke the relevant regulatory provisions to compel the submission of the necessary missing information.

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

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: BC3D1303

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 frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. This development is positioned off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of this proposal, combined with its proximity to the shoreline, raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful decision. There is critical environmental data that is absent, baseline information that is inconsistent and limited, and numerous key aspects of the proposal that remain undefined. The flexible design framework employed inhibits a clear assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by solid evidence.

There are evident and serious policy conflicts present in the proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability within policy frameworks.

The unprecedented scale of this proposal, with large turbines situated in close proximity to the shore, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit for lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives in the application is fundamentally insufficient and does not fulfil the legal requirements of the Environmental Impact Assessment process. Instead of offering a systematic and reasoned evaluation of viable alternatives based on their environmental impacts, the submission provides a narrative description of how

the project has developed. This method does not effectively demonstrate that less harmful options have been appropriately identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a lack of transparent and evidence-backed comparison concerning various offshore sites, development scales, or design configurations. The application notably fails to show that the developer has adequately considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be minimised. The sensitivity of the West Lewis coastline and the critical nature of proximity to the shore in assessing impact mean that the lack of such analysis hampers any conclusion regarding whether the proposed location is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient proof that alternative pathways have been thoroughly examined to prevent or lessen impacts on sensitive sites. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy to avoid these impacts and the lack of comparative analysis suggest that mitigation by design has not been utilised, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not adequately prove that environmental harm has been reduced through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, which impedes the competent authority's ability to ascertain whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it cannot be confirmed that the proposal is a sustainable or policy-compliant option.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally flawed, lacking a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data provided is inadequate, and the methodologies employed fail to effectively capture vital aspects such as species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Significant deficiencies are evident in the evaluation of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. The disregard for their core foraging range and behavioural patterns results in an incomplete evaluation

of the potential impacts from construction activities, noise, and increased human activity. This oversight compromises any claims regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks displays considerable shortcomings, particularly due to an overreliance on aerial surveys that create significant detection biases, especially in challenging Atlantic conditions. This methodology is likely to lead to an underestimation of basking shark presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to integrate or appropriately consider such data contributes to an inadequate baseline and diminishes the credibility of the conclusions drawn.

The methodological inadequacies in the assessment result in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation generates considerable uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the standards set by the Environmental Impact Assessment regime or the National Planning Framework 4, as it fails to properly identify or evaluate protected species. The level of uncertainty introduced by these deficiencies precludes 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.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is marred by significant methodological weaknesses and internal inconsistencies, resulting in an unreliable evaluation of impacts. Notably, the application does not adequately demonstrate that internationally important seabird populations, many of which are already in decline, will remain unaffected by the proposed development. The west coast of the Isle of Lewis is a critical habitat for these species, yet the assessment fails to provide sufficient evidence that their foraging areas and migratory pathways will be preserved.

Moreover, a fundamental contradiction is evident within the application. While the developer asserts that there will be no significant adverse effects, they simultaneously advance a Habitats Regulations derogation case, which is only required in scenarios where significant harm is anticipated. This inconsistency raises serious doubts about the validity of the conclusions drawn in the assessment, indicating that they are not

substantiated by the underlying evidence.

The assessment also does not adequately address the importance of key feeding grounds associated with protected sites such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces substantial uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, and there is a likelihood that mortality rates are underestimated. This concern is exacerbated by incomplete baseline data and a lack of understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor adds another layer of risk, creating a potential barrier to primary flight paths used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality within this corridor, particularly for species with small global populations, have not been adequately assessed.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which hampers a lawful conclusion in favour of granting consent.

Furthermore, the identified deficiencies reflect a failure to comply with National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places this proposal in direct opposition to national policy. Collectively, these factors culminate in the conclusion that the assessment does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage associated with the West Lewis coastline is fundamentally deficient, neglecting to recognise it as a dynamic cultural landscape wherein environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, reducing heritage to mere static assets and failing to acknowledge their ongoing social, cultural, and spiritual relevance within the community.

Particularly problematic is the handling of significant cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are not just historical markers; they serve as active burial grounds and places of spiritual significance. However, the assessment mistakenly categorises these sites as static features, overlooking their contemporary use and the implications of development on their surroundings. This lack of understanding leads to an inadequate evaluation of cultural impacts, disregarding the vital role these sites play in community life.

Moreover, there is a striking absence of consideration for intangible cultural heritage. Elements such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment are essential to the area's identity but are missing from the assessment. This omission represents a critical gap, as understanding the cultural impact of the proposed development necessitates the inclusion of these factors.

Concerns also arise regarding the rights and involvement of the community. The Gaelic-speaking population embodies a unique cultural identity and possesses characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken, which undermines the validity of the assessment and fails to adhere to the established principles of community participation in decisions that affect cultural and environmental interests.

A significant procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to fulfil its legal obligation to evaluate the social, cultural, and economic repercussions on the island community. This alone renders any determination unlawful.

From a policy standpoint, the aforementioned deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The failure to engage with both tangible and intangible heritage, alongside the neglect of living cultural practices, clearly deviates from policy obligations.

In summary, the failure to adequately assess living heritage, the value of intangible cultural aspects, community rights, and compliance with statutory requirements leads to a considerable evidential gap. The cultural repercussions of the proposed development have not been thoroughly evaluated, and the application falls short of providing a solid foundation for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment lacks transparency, as the full report has not been published, creating a significant evidential gap. This omission prevents both the public and the competent authority from fully understanding the social risks highlighted by the developer's own research. Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and should not be considered speculative. However, the lack of access to the complete assessment limits scrutiny of these findings, hindering the assessment of their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with cultural loss identified as a concern in the developer's findings. Despite this acknowledgment, these impacts have not been adequately integrated into the main

application or given the necessary consideration. The non-disclosure of the full Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency adversely impacts the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is crucial for developments of this scale, particularly when community character and functionality may be at risk. By failing to provide the complete dataset, the application lacks a comprehensive evidential basis for weighing benefits against potential harm.

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

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the lack of access to the full Social Impact Assessment. This represents a material omission within the application and signifies a failure to meet the evidential standards of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, in conjunction with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This prevents a lawful determination and strengthens the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly lacking. It does not capture the extent of change or the sensitivity of the environment surrounding the West Lewis coastline. This area is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The placement of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally changing this character and causing a permanent transformation of the landscape.

The application fails to represent the extent of visual change accurately. The size and closeness of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations. This would impact visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not properly convey the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. It appears that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises concerns that the scale of visual impact has been

understated, which undermines the reliability of the assessment.

Additionally, there is a failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of acknowledging their interdependence, the assessment treats these as separate entities, leading to an incomplete analysis of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The scale of change is at odds with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to adequately assess construction and pollution risks, resulting in an incomplete evaluation of likely environmental effects. It proposes significant seabed preparation and installation works in a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on future mitigation and contingency measures to be created after consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies.

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 effects of these impacts. This uncertainty also applies to the potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hinders evaluation of whether adequate safeguards are in place to respond to pollution incidents. This situation introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the absence of defined mitigation measures, detailed management plans, and uncertainty about potential impacts culminate in a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life associated with the application is inadequate, lacking a thorough evaluation of ecological and socio-economic impacts. A significant flaw is the assumption that fishing activity can be displaced without consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure. This lack of information is critical, as the risk of displacement could lead to overfishing elsewhere, potentially resulting in wider economic repercussions for the local fleet. Consequently, without a clear, evidence-based assessment, the effects on fisheries and livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life across substantial distances, with particular implications for species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application tends to minimise these effects without sufficient supporting evidence.

There exists a troubling inconsistency within the application, as it acknowledges the

necessity of licences to permit harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where harm is expected to an extent that requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions is not possible.

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

Overall, the deficiencies regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of 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 omission of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant concern. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism, particularly in sectors like astro-tourism. The proposed installation of permanent red aviation lighting, visible across long distances, would create an intrusive “wall of light” effect that fundamentally alters the night-time environment.

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

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

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

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

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

TOURISM

The assessment of tourism impacts is critically inadequate and neglects to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. This area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which is demonstrated by the fact that 86% of visitors are attracted by the scenery. However, the application fails to provide any quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the island has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and contributing up to 16% of the local economy. Despite this progress, the application does not evaluate how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the island. Without this essential analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a sector that is both established and expanding.

Moreover, the assessment overlooks the crucial role of environmental quality in supporting tourism, including the significance of unspoiled landscapes and dark skies to enhance visitor experience and to tap into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on a

recognised and growing segment of the local economy.

Within the context of an island community that has limited economic diversification, the failure to consider 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 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, especially concerning economic impact and the necessity to show net benefit. It also contradicts strategic goals that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

In summary, the collective failure to quantify tourism impacts, analyse the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency leads to a significant evidential gap. This hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This proposal mirrors the fundamental issues that led to the refusal of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was highlighted. Although the current submission is made under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A reliable evidential basis for determination is notably absent in the application. Critical gaps in baseline data, the reliance on an undefined design envelope, and unspecified mitigation measures contribute to this inadequacy. Furthermore, the omission of key impact pathways, such as those affecting nocturnal wildlife, the full onshore infrastructure, and tourism impacts, render the Environmental Impact Assessment incomplete. This deficiency hinders a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a significant omission. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby making the application unsuitable for determination.

The proposal directly conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural

heritage. Additionally, there is a lack of evidence to support acceptable health and wellbeing impacts, as well as 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 sufficiently assessed, which obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential threshold required to demonstrate that adverse effects are excluded beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of the impacts.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks prevents an evidence-based decision. The competent authority must either refuse consent based on these grounds or exercise the 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: 8F549139

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. The scale, design, and proximity of the development raise essential issues concerning its alignment with statutory obligations, national policy directives, and the principles of sustainable development.

The application lacks a sufficient evidential foundation necessary for a lawful assessment. Important environmental data is absent, baseline information is either limited or inconsistent, and numerous critical aspects of the proposal remain undefined. The proposal's flexible design framework obscures a clear understanding of the potential significant effects, and reliance on unspecified mitigation measures means their anticipated effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are evident and substantial conflicts with policy frameworks. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate that it can fulfil national obligations to safeguard biodiversity, climate considerations, and environmental integrity. These discrepancies directly challenge the statutory requirements for consent and hinder the competent authority's ability to determine the development's policy acceptability.

The unprecedented scale of the proposal, involving the installation of large turbines in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle is applicable.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential information, rendering it materially deficient in its account of the potential environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This flexibility introduces significant uncertainty and hinders the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, obstructing both the public and the competent authority from fully comprehending the actual environmental effects.

Additionally, the application is predicated on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought under the premise that any environmental harm will be addressed at a subsequent stage. This approach inhibits a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and corresponding mitigations be clearly established prior to determination.

Furthermore, significant evidential deficiencies arise from gaps in baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. These issues lead to uncertainty surrounding the scale and significance of impacts, particularly when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result of these shortcomings, the application fails to satisfy the evidential threshold mandated under the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that the impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation, and the existence of gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot appropriately determine the application based on the information available.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts related to the proposed development is fundamentally flawed, characterised by significant gaps in evidence and internal

inconsistencies that undermine its conclusions. It is crucial to note that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide adequate evidence to demonstrate that these species will not be adversely affected. Additionally, the development is situated within key foraging areas and migratory pathways, yet there is a lack of robust evaluation regarding the implications of displacement, collision risk, or habitat loss.

Within the application lies a fundamental contradiction. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions presented lack support from the underlying evidence. The assessment does not sufficiently address whether seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these vital feeding grounds is not fully considered, and reliance on modelling methods introduces uncertainty, particularly for species experiencing severe decline, such as Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses remain inadequately understood.

Moreover, the placement of turbines within a recognised migratory corridor introduces a substantial risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. There is an inadequate assessment of the long-term implications of continued mortality within this corridor, as well as the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and precludes a lawful conclusion that would support consent.

Overall, the deficiencies identified illustrate a failure to comply with National Planning Framework 4 in terms of biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has significant deficiencies in the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was

commissioned by the developer, which included focus groups with local residents; however, the complete report remains unpublished. This creates a notable evidential gap, hindering both public understanding and the competent authority's ability to assess the full range of social risks highlighted by the developer's own investigations.

Residents have reported experiencing measurable stress, anxiety, and concern linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on direct engagement, thus are not speculative in nature. Nevertheless, the lack of access to the full assessment curtails proper scrutiny of its findings and restricts the evaluation of their significance during the decision-making process.

Additionally, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer indicating concerns over “cultural loss.” Despite these impacts being identified, they have not been thoroughly incorporated into the main application or given due consideration. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functioning. The absence of the complete dataset means the application does not provide an adequate evidential foundation for weighing the benefits against the harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 with respect to health and wellbeing. Development proposals must foster positive health outcomes and avoid causing harm, yet the evidence currently available points to existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to establish compliance with this policy.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create an industrial presence that would fundamentally alter this character, resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts fails to adequately represent the magnitude of visual change expected from this development. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which directly impacts visual amenity and undermines the defining qualities of naturalness and remoteness.

Concerns regarding the methodology used for selecting and presenting visual viewpoints further exacerbate the deficiencies in the application. Evidence indicates that these viewpoints may not capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and significant landscapes. This suggests that the assessment has understated the visual impacts, casting doubt on its reliability.

Moreover, the application neglects to consider 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. By treating these sites as isolated assets, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connections to the natural horizon. This represents a broader cultural and spatial harm that the application has not adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The scale of proposed change does not align with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any claims of compliance with policy.

It is evident that the impacts identified in the assessment cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be dominant and unavoidable. The anticipated change is fundamental and permanent, making it unlikely that any mitigation measures could reduce the impacts to an acceptable level.

In conclusion, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These significant 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 assessment of construction and pollution risks within the application is notably incomplete, failing to provide the necessary detail for evaluating potential environmental effects. Substantial seabed preparation and installation works are proposed in a high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that would be formulated after consent, which undermines the ability to meaningfully assess their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

There is significant uncertainty regarding 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 also encompasses potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application obstructs the assessment of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and compromises the capacity of the competent authority to evaluate environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is in conflict with the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation need to be evaluated prior to consent; without such information, a lawful determination cannot be achieved. The application additionally 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 render the assessment fundamentally deficient. These shortcomings inhibit a robust evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry, yet the application lacks a thorough assessment of the

ecological and socio-economic impacts. There is a concerning assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can bear additional pressure. This critical oversight raises the risk of overfishing in other areas and poses potential economic repercussions for the local fleet. Without a detailed, evidence-based evaluation, it is impossible to grasp the true impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life over large distances, affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is deeply concerning, yet the application underestimates the significance of these effects and lacks adequate supporting evidence.

The application exhibits a troubling inconsistency in acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction seriously undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly when harm is anticipated that requires legal authorisation. Furthermore, the assessment does not address the cumulative impacts resulting from habitat disturbance, noise, and the displacement of fishing activities. Without a thorough analysis of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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 existing marine users or prevent unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal signifies sustainable development. Collectively, the inadequacies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The offshore turbines and onshore works are interconnected, yet the assessment treats them separately. This fragmented approach fails to capture the overall environmental and socio-economic effects of what is a single integrated project.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation across areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, limiting the understanding of the project's total environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered together, yet the separation leads to an incomplete 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 fails to show that these impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy development goals. The application does not sufficiently address this issue or confirm that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, prompting questions about deliverability and lawful execution.

From a policy standpoint, the failure to assess the project holistically 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 inability to prove 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, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally changes the night-time environment, which is particularly concerning given the West Lewis coastline is noted for its exceptionally dark skies. These dark skies are integral to the area's environmental quality, cultural identity, and tourism value. The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, creating a significant gap in the overall landscape and environmental assessment.

In addition, the proposal lacks an evaluation of the impacts on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel. These species are particularly vulnerable to artificial lighting due

to phototaxis, leading to disorientation and increased collision risk. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, and the associated risks of increased mortality, have not been addressed.

The ornithological assessment's reliance on daytime survey data is also troubling, as it does not capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting. The lack of site-specific night-time data presents a critical gap in understanding the ecological impacts.

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

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. This application reiterates the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite the current proposal being presented within a strengthened policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains deficient.

The application lacks a comprehensive and reliable evidential basis for its determination. There are significant gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and a failure to address important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, inhibiting a thorough understanding of the likely significant effects and residual impacts.

Procedurally, there are notable failures as well. The absence of a compliant Island

Communities Impact Assessment breaches the statutory requirements established under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a serious oversight. 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 is at odds with the National Planning Framework 4. It does not demonstrate the necessary protection for biodiversity, natural areas, and cultural heritage, 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. Moreover, the cumulative impact of both offshore and onshore components has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties persist regarding environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in some instances. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of the impacts.

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

In summary, the application is both procedurally and substantively unsuitable for determination. The scale of informational deficiencies, combined with conflicts with policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, the competent authority must either refuse consent based on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

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

Additional Comments

Having heavily invested and set up a family run commercial fishing business in Stornoway I am deeply opposed and object to any offshore / onshore development associated with Spiorad.

I believe both the local on and offshore environments are going to be devastated beyond belief with serious impacts on junival migrating and local marine life inc birdlife, fish and shellfish marine stocks.

Kind regards
[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: 1B9E0AAA

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report demonstrates substantial deficiencies, failing to deliver a comprehensive, transparent, and trustworthy evaluation of the anticipated environmental impacts associated with the proposal. Notably, the absence of specific turbine dimensions, layouts, or configurations due to the reliance on a flexible Project Design Envelope creates considerable uncertainty. This lack of clarity undermines the assessment's integrity, leading to the potential that the impacts delineated may not accurately mirror the eventual development, thus obstructing both public and competent authority comprehension of the true nature of environmental effects.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately address the intertwined nature of community identity and cultural heritage along the West Lewis coastline, viewing it merely as a

collection of static assets instead of a vibrant cultural landscape where environment, language, and tradition are deeply interconnected. It neglects the ongoing social, cultural, and spiritual functions of heritage within the community.

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

authority's ability to gauge the full scope of social risks identified through the developer's own research.

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

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

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

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

The procedural ramifications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and seascape impacts surrounding the proposal is fundamentally inadequate and does not properly account for the scale of change or the sensitivity of the environment in question. The West Lewis coastline is characterised by its unspoiled Atlantic horizon, a largely undeveloped nature, and a profound sense of

remoteness. Should large-scale turbines be introduced near the shoreline, their presence would create an overwhelming industrial landscape, irrevocably changing the character of the area and leading to a permanent transformation of the landscape.

Moreover, the application fails to accurately depict the extent of the visual alterations anticipated. The size and proximity of the turbines would dominate vistas from residential locales, historic sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of these impacts within the context of such a sensitive environment.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence suggests that certain viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This risk implies that the visual impact may have been understated, casting doubt on the reliability of the assessment.

Another notable shortcoming is the lack of an evaluation of the interconnected nature of landscape, seascape, and cultural heritage. Key sites, including the Calanais Standing Stones and other Scheduled Monuments, are intrinsically linked to their wider landscape through visual and spatial relationships with the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these connections, thereby altering how heritage assets are perceived and diminishing their ties to the natural horizon. This signifies not just a visual concern, but a broader cultural and spatial detriment that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 regarding the protection of natural environments and historic assets. The anticipated changes contradict the imperative to preserve landscape character, visual amenity, and the contextual integrity of culturally significant sites. The failure to conduct a comprehensive worst-case assessment further undermines any assertion of policy compliance.

Additionally, it is evident that the identified impacts cannot be adequately mitigated. Given the scale, height, and proximity of the turbines, their presence would be both prominent and inescapable. The resulting transformation is consequently fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of potential construction and pollution risks is insufficient and lacks the necessary detail to evaluate environmental effects adequately. The proposal entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, thus hindering any meaningful assessment of their adequacy or effectiveness.

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

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

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application fails to allow for the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated before consent, and the absence of this 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 combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings prevent a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks thoroughness and does not adequately evaluate ecological or socio-economic impacts. The fishing industry is active off the West Lewis coast, which is home to a diverse marine ecosystem. However, the application does not prove that these habitats and uses can be safeguarded or sustained without significant disruption.

A major concern is the assumption that fishing activities can be moved without consequences. The application fails to provide evidence that alternative fishing grounds are available and accessible, or that they can handle additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas and might have broader economic repercussions for the local fishing fleet. The consequences for fisheries and livelihoods cannot be comprehensively understood without a clear and evidence-based assessment.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across considerable distances, impacting species such as dolphins. The potential disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without sufficient evidence to support such claims.

There is also a notable inconsistency in the application, as it acknowledges the need for licenses to allow harm to European Protected Species, while simultaneously stating that the impacts are negligible. This contradiction weakens the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is necessary to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the insufficiency of evidence regarding fishing displacement, the minimization of acoustic impacts, and the internal contradictions indicate that the assessment 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 lacks a comprehensive assessment of onshore infrastructure, resulting in an incomplete evaluation of the project's impacts. The

offshore turbines and the associated onshore works are interconnected; however, their assessment is conducted separately. This fragmented approach obscures the full extent of the environmental and socio-economic consequences of what is essentially a singular integrated project.

The onshore infrastructure includes cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These operations entail excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By neglecting to adequately assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project should be evaluated collectively. The existing separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Moreover, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This raises serious concerns about biodiversity protection and highlights a significant evidential gap.

The proposal also brings forth issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts renewable energy objectives. The application inadequately addresses this matter and fails to show that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises doubts about the project's deliverability and legal implementation.

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

In summary, the combination of separating project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts renders this section of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This alteration would fundamentally change the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Such an omission is particularly significant given the importance of dark skies to the identity of the area and to emerging sectors like astro-tourism. The failure to consider these impacts reveals a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study and thus fails to evaluate how the proposed aviation lighting may affect these species or raise mortality rates.

Furthermore, the reliance on daytime survey data in the ornithological assessment neglects nocturnal activity and associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

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

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

TOURISM

The application presents a concerning inadequacy in assessing tourism impacts, neglecting to consider the economic and social repercussions for a vital sector of the

Isle of Lewis economy. The area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are essential to tourism, which is heavily reliant on these natural attributes. Although it is noted that 86% of visitors are attracted by the scenery, there is no quantitative assessment on how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism has experienced notable growth, rising from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, making up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the degradation of environmental quality could affect the Tourism Gross Value Added or the broader economic resilience. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and flourishing sector.

Furthermore, the assessment disregards the critical role of environmental quality in sustaining tourism, especially the significance of unspoiled landscapes and dark skies to visitor experience, alongside emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the impacts on a recognised and growing segment of the local economy.

For a community on an island with limited economic diversification, the neglect 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 examined as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and acknowledging the island's economic dependency lead to a significant gap in evidence. This hinders a thorough evaluation of economic effects and supports the view that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. The application echoes the core issues that led to the rejection 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 prioritises biodiversity, peatland protection, landscape integrity,

and community wellbeing, it remains deficient.

There are significant gaps in baseline data, reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The omission of a full Social Impact Assessment further complicates matters, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally 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 determination 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 negative impacts on tourism represent permanent consequences that cannot be mitigated satisfactorily.

Collectively, these issues render the application procedurally and substantively unfit for determination. The significant information deficiencies, combined with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the missing information.

In light of these factors, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I live on the Westside of the island and will be impacted by this wind farm. I will see and hear these from my house, the fact that they are so close to shore is not good. I am not against wind energy on the whole and understand there is a need for alternatives to fossil fuels however, the scale of this on an island so small is preposterous. It is too close to shore and too big a scale for such a small place. The disruption it is going to cause for years as its being built only benefits a few people, the companies who own it. It is on the news all the time that peatcutting should be banned (to heat our own homes) but there is no word of this when masses and masses of peatland is going to be opened and carbon lost for connecting this to Stornoway. Its going to disrupt travel for a long time, the amount of workers coming up here will be unsustainable for such a small island that can barely house its own people never mind thousands of workers. I cant see the community benefits, a few quid thrown here and there for local organisations and charities ain't going to cut it in my eyes. We will still be paying premium rates for electric as the energy will be going into the grid and resold to us at the highest prices in the UK. We have unspoilt, beautiful landscapes here, tourism is so important to the island and godawful huge wind turbines is not going to be the beauty they are expecting. I believe it will affect house prices on the Westside as who wants to look at that all day long. The dark skies will no longer be dark with red lights flashing all night long. The work and piling itself is going to be frustrating.

I cant think of any benefits for people who live here, can you???

Its ok for people in offices and company's far away to plan this without guilt for the people who live here but its not right. The Scottish government should never have sold the right to the seabed here(at a paltry price im lead to believe) without consulting its constituents. The local council may be able to be bought, that is well known, but they dont represent the residents of this island as they are supposed to. Its being shown on the media that we aren't against this planned wind farm but believe me WE ARE. Just because we dont go out and protest and march, its not how we are, we are a reserved people who hold on to our culture, we are very close to the land and sea so this planned works is nothing short of a tragedy.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 7D129E1C

