

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 associated documentation reveals several material deficiencies concerning planning, environmental impacts, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns arise from the proposal's scale, proximity, and design, which fundamentally question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and key elements of the proposal remain undefined. Furthermore, the flexible design framework employed hinders a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means that their effectiveness cannot be properly evaluated. Consequently, the documentation fails to facilitate a full or informed understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust supporting evidence.

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

The unprecedented scale of the proposal, with large turbines positioned close to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential elements and does not offer a comprehensive, transparent, or dependable account of the likely environmental consequences of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment and leading to a situation where the impacts outlined may not correspond to the actual development constructed. As a result, both the public and the competent authority are left without a true understanding of the potential environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that any environmental harm will be mitigated later prevents a thorough evaluation of the effectiveness of these measures and an assessment of any residual impacts. This deferral of critical information to post-consent phases is procedurally improper and conflicts with the core objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly established prior to any determination.

Further complicating the situation are substantial evidential deficiencies, such as gaps in baseline data, limitations within the methodology employed, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to comply with statutory requirements.

Consequently, the application does not meet the evidential standards stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly with regard to protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in terms of biodiversity protection and environmental integrity, as it cannot be established that impacts have been fully assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and lacks a comprehensive understanding of ecological receptors. This marine system is biologically active and highly sensitive,

yet the data collected is incomplete. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of species, leading to an assessment that cannot reliably inform evaluations of potential impacts.

One notable shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active foraging and movement patterns along the coast. By not considering their core foraging range, the assessment fails to evaluate the potential impacts of construction disturbance, noise, and increased activity on these animals. This oversight undermines any conclusions drawn regarding significant effects on otters.

Additionally, there are serious deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions, which is likely to lead to an underestimation of their presence. This is further highlighted by established land-based observations that indicate these sharks frequently utilise these waters. The omission of such crucial data results in an incomplete baseline, which in turn weakens the conclusions drawn.

The methodological weaknesses indicate that any conclusions suggesting negligible or non-significant effects are based on unfounded assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits the meaningful assessment of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions. This introduces uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment requirements and the stipulations set out in National Planning Framework 4, as it fails to properly identify or assess protected species. This uncertainty hinders the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, it is not lawful to grant consent under these circumstances.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, lacking the necessary evidence and containing numerous internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself. The developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious questions about the validity of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence.

Moreover, the assessment lacks sufficient evidence to ensure that seabirds linked to protected areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, especially concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is insufficient and behavioural responses are not well understood.

The placement of turbines within a recognised migratory corridor further exacerbates the risk by effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to sufficiently assess the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also in question, as the application does not meet the evidential standards required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and undermines a lawful conclusion in support of consent.

In summary, the identified deficiencies reflect a lack of adherence to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy. Collectively, these issues render the assessment unreliable, due to methodological weaknesses and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided in the application is fundamentally flawed, particularly regarding the cultural heritage and community identity associated with the West Lewis coastline. This area is a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. Instead of recognising these relationships, the application adopts a reductive perspective, treating heritage as a collection of isolated, static assets. Such an approach fails to acknowledge the ongoing social, cultural, and spiritual roles these elements play within the community.

A significant shortcoming is evident in how the assessment treats culturally important sites, specifically the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as mere static features. This misrepresentation ignores their continued use and significance, as well as the potential impacts of the proposed development on their surroundings. Consequently, the evaluation of cultural effects remains incomplete, overlooking the cemeteries' essential role in community life.

Additionally, the application neglects to consider intangible cultural heritage elements, which include the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but have been entirely omitted from the assessment, representing a major oversight. Without addressing these components, a comprehensive understanding of the cultural impact of the development is unattainable.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, recognised as having characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles of participation in decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, 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 obstructs a lawful determination of the proposal.

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

In conclusion, the combined failures to assess living heritage, intangible cultural values, community rights, and statutory requirements create a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application fails to provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The application significantly lacks the necessary transparency regarding social impacts, health, and wellbeing, rendering its evaluation materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the complete report has not been made public. This

withholding of information creates a critical evidential gap that hinders both the public and the relevant authorities from grasping the full extent of the social risks identified in the developer's own research.

From the summaries that are available, it is clear that residents are currently experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and should not be dismissed as speculative. The lack of access to the full assessment restricts proper scrutiny of these findings and limits the capability to ascertain their significance in the decision-making process.

Moreover, there is a distinct perception among the community that this proposal threatens their identity and cohesion, with the developer's findings identifying "cultural loss." Nevertheless, such impacts have not been sufficiently integrated into the main application nor afforded the proper consideration they deserve. By not disclosing the full Social Impact Assessment, the true human and social costs of the development remain obscured.

This absence of transparency detrimentally impacts the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health consequences is crucial for developments of this magnitude, particularly when the character and function of the community may be at stake. The application, lacking the full dataset, fails to present a robust evidential foundation for weighing the benefits against the harms.

On a policy level, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm; however, the evidence presented indicates adverse effects that have not been fully revealed. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

The procedural ramifications are significant, as the competent authority is unable to conduct a thorough 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 meet the evidential standards set forth by the Environmental Impact Assessment framework.

Ultimately, the failure to disclose the full Social Impact Assessment, coupled with the evidence of existing adverse impacts, renders the evaluation incomplete and unreliable. This situation hinders a lawful determination and underscores that the application is unsupported by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking and does not sufficiently account for the extent of change or the sensitivity of the affected environment. The character of the West Lewis coastline is defined by its open Atlantic

horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would create an ongoing and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Given the size and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment fails to convey the true level of impact or its significance in relation to such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. There is evidence that the viewpoints selected may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and significant landscapes. This raises the possibility that the extent of visual impact has been underestimated, diminishing the credibility of the assessment.

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

The industrialisation of the seascape would sever these relationships, changing the context in which heritage assets are perceived and disrupting their link to the natural horizon. This represents not only a visual impact but also a deeper cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change is incompatible with the obligation to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any argument of policy compliance.

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is not compatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the environmental assessment related to construction and pollution risks. It lacks the necessary detail to effectively evaluate potential environmental impacts, particularly given that the West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. This sensitive environment necessitates well-defined Construction Environmental Management Plans and Pollution Prevention Plans, which are currently absent. Instead, the application relies on vague mitigation and contingency measures that are to be developed after consent is granted, obstructing any meaningful assessment of their potential effectiveness.

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

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

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

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

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 assessment of the proposed onshore infrastructure is inadequate and does not fully address the impacts of what constitutes a singular integrated project. The offshore turbines and onshore activities are interconnected, yet they are evaluated independently, leading to a disjointed assessment that fails to reveal the comprehensive scale of environmental and socio-economic consequences.

Significant elements of the onshore works comprise cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access routes through fragile landscapes. These construction activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The application lacks a thorough examination of these impacts, obstructing a complete understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application hinders the accurate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components be evaluated collectively. However, the division of offshore and onshore elements prevents a full comprehension of the combined impacts on peatlands, habitats, and local communities.

Additionally, there are significant risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy measures. The application fails to show that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, leading to a clear evidential gap in the context of biodiversity protection.

Concerns also arise regarding the carbon balance implications of the proposal. Disturbance of peatland may release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or prove that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land could lead to conflicts with established land use and legal rights. There is a lack of evidence that the essential consents or processes have been initiated, raising doubts about the project's feasibility and lawful execution.

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

Collectively, the disjunction of project components, the absence of comprehensive assessments, and the lack of substantiation regarding environmental and land use impacts render this section of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks any assessment of dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The West Lewis

coastline is known for its exceptionally dark skies, which play a vital role in the environmental quality, cultural identity, and tourism appeal of the area. The introduction of permanent red aviation lighting, which will be visible over long distances, will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is especially important considering the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to address these impacts represents a clear gap in the overall assessment of the landscape and environment.

Moreover, there is no analysis of how nocturnal wildlife will be affected. Certain species, including 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 evaluate the effects of aviation lighting on these species or their mortality rates.

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

Without assessing the nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be negatively impacted. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt is not met, 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 diminishes the broader evaluation of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

TOURISM

The proposed development involves large-scale offshore infrastructure, yet the assessment of its tourism impacts is severely lacking. This gap in evaluation does not take into account the economic and social effects on a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application acknowledges

that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how such infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the island has seen substantial growth, with revenues increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the local economy. However, the application neglects to model how the anticipated industrialisation of the seascape and deterioration of environmental quality would affect the Tourism Gross Value Added and the wider economic resilience of the area. Without this analysis, it is impossible to ascertain if the development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment does not consider the significance of environmental quality in promoting tourism. Unspoiled landscapes and dark skies are vital to visitor experiences and burgeoning markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the impacts on an acknowledged and growing component of the local economy.

Given the context of an island community with limited economic diversification, the oversight in assessing tourism impacts carries broader implications for employment, local enterprises, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately examined, as required under 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 establish net benefit. It also contradicts strategic goals that prioritise tourism as a growth sector and fails to furnish sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the inability to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This hampers a comprehensive evaluation of the economic effects, leading to the conclusion that the application is fundamentally incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm presents significant shortcomings that undermine sustainable development, failing to meet the necessary statutory duties and national policy requirements. The project mirrors the core issues of the 2008 Lewis Wind Power proposal, which was previously denied due to unacceptable levels of industrialisation. Despite being submitted under an updated policy framework that emphasises biodiversity, peatland conservation, landscape preservation, and community wellbeing, the proposal still falls short.

Critical gaps in the evidence base are evident, particularly concerning baseline data and the reliance on an undefined design envelope. The proposal includes unspecified mitigation measures and omits key impacts such as those on nocturnal wildlife, the full extent of onshore infrastructure, and potential effects on tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of significant effects or residual impacts.

Moreover, procedural deficiencies abound. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the non-disclosure of a full Social Impact Assessment constitutes a serious omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with National Planning Framework 4, lacking evidence of biodiversity protection, safeguarding natural areas and cultural heritage, and failing to demonstrate acceptable health and wellbeing impacts. It does not provide any proof of net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are not only uncertain but potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The application does not meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposal is set to cause extensive and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships, along with the negative repercussions on tourism, represent permanent effects that cannot be sufficiently mitigated.

In summary, the application is procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or mandate the submission of the necessary missing information.

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

Additional Comments

What are we leaving for future generations - masses of vast wind turbines farms whose working life span is a mere 20-25 years and the cost of maintaining outdated turbines is multiple times that of new installations -.

The rural population is much smaller than that of large cities and towns but surely 'townies' can understand the need to preserve our precious rural land and seascapes.

The Pathway to 2030 has still been unable to show us a detailed plan of this Pathway. We, the rural dwellers are allowed brief very poor detailed maps at Consultation meetings which are carefully chopped up in 'salami' style. So the over site is not really revealed unless you hunt for the joins.

And there is all the huge infrastructure plus the Battery stations and the substations - it is a horror movie development for what? Huge profits for a few and huge energy bills for the many.

Please let us move forward with proper realistic energy policies and not allow false data cloud our judgement.

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: CF82247F

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Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental protection, cultural considerations, and procedural integrity. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the proposal's scale, proximity, and design challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent, and key elements of the proposal remain undefined. The flexible design framework employed hampers a comprehensive understanding of potential significant effects. Moreover, the proposed mitigation measures have yet to be detailed, leaving their effectiveness unassessable. Consequently, the documentation does not facilitate a complete or informed understanding of environmental, cultural, or community impacts, making the claims of negligible or non-significant effects unsubstantiated by robust evidence.

Substantial conflicts with policy are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and the health and wellbeing of the community. It fails to prove that national standards for protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These discrepancies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to assess the development's acceptability in policy terms.

The scale of this proposal is unprecedented in this region, featuring large turbines in close proximity to the shoreline, which raises serious concerns about landscape capacity, visual dominance, and environmental impact. The lack of sufficient information, the reliance on unspecified mitigation measures, and evident policy non-compliance collectively indicate that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, adherence to the precautionary principle is essential.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured comparison of realistic alternatives based on environmental effects. This approach is materially inadequate and does not meet the statutory requirements of the Environmental Impact Assessment regime. It fails to demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a notable lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has seriously considered positioning turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the absence of such analysis prevents any conclusion that the proposed siting is the least damaging option available.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been employed, instead placing reliance on post-design mitigation measures.

Consequently, the application fails to 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 assessing whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is 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 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.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant shortcoming is evident in the treatment of culturally important sites such

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

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

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

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to assess the social, cultural, and economic repercussions on the island community. This omission alone renders a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report remains unpublished. This lack of disclosure constitutes a significant evidential gap that hinders the public and the competent authority from grasping the complete scope of social risks identified in the developer's own research.

Summaries indicate that residents are already facing measurable stress, anxiety, and

concern due to the scale and proximity of the proposal. These impacts are derived from direct engagement, thus are not speculative. However, the failure to make the full assessment available limits proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

There is additional evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" acknowledged within the developer's own findings. Despite this acknowledgment, such impacts have not been fully incorporated into the main application or afforded the appropriate weight. The withholding of the complete Social Impact Assessment therefore clouds the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function may be compromised. The application, by not providing the full dataset, fails to present a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, existing evidence highlights adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and underscores that the application lacks sufficient information to proceed.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a critical shortfall within the Environmental Impact Assessment. The West Lewis coastline boasts particularly dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will result in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is a significant oversight

considering the essential nature of dark skies to the identity of the region and the burgeoning sectors of tourism, such as astro-tourism. Consequently, the absence of these assessments creates a clear void in the overall evaluation of landscape and environmental impacts.

Furthermore, the impacts on nocturnal wildlife remain unexamined. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risks of collision. The application does not feature any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting may impact these species or elevate mortality rates.

The reliance on daytime survey data within the ornithological assessment exacerbates this issue, as it does not capture the nocturnal activity or the associated risks that species such as Kittiwakes face while foraging or migrating at night. The absence of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the protection of natural places and the maintenance of environmental quality. Additionally, it undermines the wider evaluation of landscape and seascape impacts, as night-time character is a crucial aspect of the environment.

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

TOURISM

The application 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 proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current proposal is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in baseline data and the continued use of an undefined design envelope raise concerns regarding the evidential foundation for this application. The reliance on unspecified mitigation measures and the omission of critical impact pathways, such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, contribute to an Environmental Impact Assessment that is incomplete. This lack of thorough analysis impedes a full understanding of the likely significant effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, while the failure to provide a complete 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 unfit for determination.

The proposal is inconsistent with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. It also fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, clouding the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing 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, loss of dark skies, disruption of cultural and visual connections, and impacts on tourism would result in permanent effects that cannot be mitigated to a satisfactory level.

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental risks, hinder the ability to make a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or activate the relevant regulatory measures to require the submission of the missing information.

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

Additional Comments

This project is a total joke. It'll make life here a nightmare and I will take my young family and we will find somewhere else to live. No local benefit at all. I object to project 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: C1BDC343

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, lacking a comprehensive, transparent, and dependable evaluation of the potential environmental repercussions of the proposal. The application utilises a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and hinders the consistent application of a worst-case scenario, thereby compromising the assessment's integrity. Consequently, the impacts described may not accurately represent the development that would ultimately be constructed, hindering both the public and the competent authority from grasping the true extent of the environmental effects.

Furthermore, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that any environmental harm will be addressed later prevents any substantial evaluation of their effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies must be clearly identified prior to any decision-making.

There are also major evidential shortcomings, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, particularly where negligible or non-significant effects are asserted without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not comply with statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to prove adherence to National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

In conclusion, the reliance on an ill-defined 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 preclude a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is insufficient and fails to meet the requirements set by the Environmental Impact Assessment regulations. Instead of offering a detailed comparison of realistic alternatives based on their environmental impacts, the application provides a narrative about the project's development. This

method does not prove that less harmful options have been thoroughly identified, assessed, and selected over more damaging ones.

There is a lack of clear and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would probably be lessened. The West Lewis coastline is sensitive, and how close developments are to the shore plays a significant role in determining their impact. The failure to analyse this aspect means that it cannot be concluded that the proposed siting is the least damaging option available.

The issues extend to the routing of cables and the assessment of landfall, with inadequate evidence demonstrating that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive areas. This includes places of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid impacts and the absence of comparative analysis suggest that mitigation by design has not been properly considered, relying instead on post-design measures for mitigation.

Consequently, the application does not show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This oversight reflects a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to determine whether there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be asserted that the proposal is a sustainable or compliant solution in terms of policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to offer a complete understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive marine system known for its biological activity, yet the baseline data is lacking, and the methodologies applied do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

A significant shortcoming is evident in the treatment of otters, a European Protected Species, where the application neglects to adequately acknowledge and assess their active use of coastal areas for foraging and movement. The assessment does not consider their core foraging range and behavioural patterns, leading to an inadequate

evaluation of the potential impacts from construction disturbances, noise, and increased activity. This deficiency undermines any conclusions made regarding the absence of significant effects on otters.

Further issues arise with the assessment of basking sharks, which relies on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that demonstrate frequent usage of these waters. The failure to integrate or properly consider such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions drawn about negligible or non-significant effects are grounded in assumptions rather than robust evidence. The absence of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been appropriately identified or assessed. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies 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 west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. The ornithological assessment associated with the proposed development contains significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate, to the required evidential standard, that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application. The developer concludes that there will be no significant adverse effects while simultaneously making a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions presented lack adequate support from the underlying evidence.

Furthermore, the assessment does not provide sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It fails to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially where baseline data is incomplete and the behavioural responses of species are not well understood.

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

From a regulatory perspective, the application does not meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and prevents a lawful conclusion in support of consent. Additionally, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute 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 seriously lacking. It fails to recognise this area as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, unchanging assets, rather than understanding their dynamic social, cultural, and spiritual roles within the community.

A major shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places for spiritual practices, but the assessment categorises them as static features. This approach neglects their ongoing use and meaning, as well as the potential impacts of development on their surroundings. As a result, the evaluation of cultural effects is incomplete and does not reflect their importance in community life.

Moreover, the application overlooks intangible aspects of cultural heritage, including

the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are absent from the assessment, representing a significant oversight. Without addressing these factors, the true cultural impact of the development remains unclear.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity that aligns with characteristics of an Indigenous People. However, no Free, Prior and Informed Consent process has been undertaken. This lack of meaningful engagement undermines the credibility of the assessment and does not reflect the established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural error is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment is a critical concern that affects the community's ability to understand the potential consequences of the proposed development. Although the developer conducted a Social Impact Assessment, including discussions with local residents, the comprehensive report has not been made publicly available. This absence creates a substantial evidential gap, hindering both public insight and the competent authority's assessment of the social risks highlighted by the developer's own research.

Residents are reportedly experiencing significant stress, anxiety, and worry due to the scale and proximity of the proposal. These impacts are directly informed by local engagement and should not be dismissed as mere speculation. However, the failure to release the full report restricts thorough examination of these findings and limits the capacity to evaluate their importance in the decision-making process.

Furthermore, the proposal is perceived to pose a direct threat to the community's identity and cohesion, with "cultural loss" noted in the findings submitted by the developer. Nevertheless, these critical impacts have not been adequately addressed within the main application, nor have they been given the consideration they merit. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs of the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when they may affect community character and functioning. The application falls short of providing a complete evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence currently available suggests the presence of adverse effects that have not been fully revealed. Without the full assessment, it is impossible to confirm compliance with these policy requirements.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts without access to the complete Social Impact Assessment, which represents a significant oversight within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable assessment. This situation inhibits a lawful determination and further supports the view that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, landscape, and seascape impacts is significantly flawed and does not sufficiently capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic views, undeveloped nature, and strong remoteness. The proposed large-scale turbines, which would be located near the shoreline, would introduce a continuous and overwhelming industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application does not fully represent the scale of this visual change. Given their size and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal spots. This dominance would adversely affect visual amenity and diminish the qualities of naturalness and remoteness that define the area. The assessment does not accurately convey the significance of this impact within such a sensitive landscape.

There are also serious methodological issues regarding the chosen visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises concerns that the true extent of the visual impact has been minimised, thereby compromising the assessment's reliability.

Additionally, there is a failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets as isolated, neglecting their interrelatedness, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and severing their connection to the natural horizon. This represents not just a visual impact, but also a wider cultural and spatial detriment that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant locations. The lack of a robust worst-case assessment further undermines any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Due to the height, scale, and closeness of the turbines, their presence would be both dominant and inescapable. The resulting changes are thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

In summary, the assessment does not accurately represent the magnitude of impact, the sensitivity of the environment, or the interconnected relationship between 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 incomplete assessment of construction and pollution risks raises significant concerns regarding the potential environmental effects of the proposal. The project necessitates extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans limits the ability to evaluate the proposed mitigation and contingency measures, which are deferred until after consent is granted. This reliance on future, undefined measures is particularly alarming given the sensitivity of the receiving environment.

The West Lewis coastline, known for its clean coastal waters and vital habitats, is susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures. Moreover, the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation further complicates the assessment. Without rigorous modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution events. This approach introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

The proposed development also poses serious risks to marine life, especially due to the

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The failure to assess the project as a whole raises significant concerns regarding the impacts on land use and legal rights. The routing of infrastructure through active croft land introduces potential conflicts, and the application lacks evidence that necessary consents or processes have been initiated. This absence of documentation leads to questions about the deliverability and lawful implementation of the project.

Furthermore, the assessment of onshore infrastructure is materially incomplete, which obscures the true scale of environmental and socio-economic effects. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately, resulting in a fragmented approach that fails to consider the cumulative effects of the project. By excluding or deferring the assessment of onshore impacts, a proper evaluation of cumulative effects on peatlands, habitats, and communities cannot be achieved.

The onshore elements involve construction activities such as cabling across protected moorland and the establishment of a substation near Stornoway. These works require excavation across deep peat areas, particularly within Barvas Moor, which is both a

significant carbon store and an ecologically sensitive habitat. The application does not provide a comprehensive assessment of these impacts, preventing a full understanding of the project's overall environmental footprint.

There are also considerable risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application fails to demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, creating a clear evidential gap regarding biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy development. The application does not adequately address this issue or demonstrate that the overall carbon balance remains beneficial.

From a policy perspective, the separation of project components and the inability to demonstrate protection of peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated undermines the application and highlights its incompleteness and unreliability, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is characterised by exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. However, the Environmental Impact Assessment completely omits the assessment of dark skies and nocturnal wildlife, representing a significant gap. The proposal includes permanent red aviation lighting, which would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

This application does not address the impacts of the proposed lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area's identity and the emerging sector of astro-tourism, this lack of assessment is particularly concerning. Furthermore, there is no evaluation of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The absence of a lighting impact assessment or phototaxis study fails to address these crucial effects.

The reliance on daytime survey data in the ornithological assessment further complicates the matter, as it does not capture nocturnal activity or its associated risks. Species like Kittiwakes, which might forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It undermines the broader assessment of landscape and seascape impacts since night-time character is an integral part of the environment.

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

TOURISM

The assessment of tourism impacts is critically inadequate and neglects to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. With tourism being intrinsically linked to the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, the application's acknowledgement that 86% of visitors are attracted by scenery highlights a glaring oversight. It fails to provide a quantitative analysis of how large-scale offshore infrastructure may affect visitor numbers, behaviour, or the overall economic contribution that tourism makes to the island.

Tourism has experienced significant growth, escalating 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. Nevertheless, the application does not examine how the industrialisation of the seascape and degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such critical analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Furthermore, the assessment disregards the significance of environmental quality in bolstering tourism, including how unspoiled landscapes and dark skies enhance visitor experiences and appeal to emerging markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in the understanding of impacts on a recognized and burgeoning aspect of the local economy.

In a context where the island community faces limited economic diversification, this neglect to assess the impacts on tourism has broader implications for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment means that these economic vulnerabilities have

gone unexamined, contravening requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefits. It also contradicts strategic objectives that prioritize tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the inability to quantify tourism impacts, evaluate environmental influences on visitor behaviour, and recognise the island's economic reliance culminates in a substantial evidential gap. This deficiency hinders a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development according to statutory duties, national policy, and evidential standards. The application reiterates the main 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 rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determining the application. It lacks complete baseline data, utilises an undefined design envelope, depends on unspecified mitigation measures, and overlooks important impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

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

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

Environmental risks are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been met, necessitating the application of the precautionary principle and preventing a lawful conclusion that the 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, the disruption of cultural and visual relationships, and the impact on tourism would result in permanent effects that cannot be adequately mitigated.

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

Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be entirely refused.

Additional Comments

I am appalled at the consideration of the N4 wind farm and the effects this will have on our islands. The works will affect the biodiversity and our beautiful landscapes, which my family - and many others - have cherished for centuries. I returned home from the mainland to work last year, and always dreamed of returning to the unspoiled beauty of my home. Rather than progress, this will dramatically affect our scenery, wildlife, and natural habitats; it will add additional pressure on my generation for finding housing in an increasingly difficult market, and add unnecessary strain on systems which are already ill-equipped to deal with current pressures. It seems backwards on one hand to be encouraging tourism, and destroying the natural habitats people cherish most about the Outer Hebrides with the other.

I have significant concerns regarding the health, environmental, infrastructural, societal and cultural ramifications that will inevitably come with the industrialisation of our island. There were concerns highlighted about the impact of particulate matter from large scale disruption of peat during construction works. Have there been any investigations into the significance of this, the potential life-limiting impact to islanders' health, or the impact increased chronic diseases would have on already limited local healthcare resources?

I am disgusted at the thought of our island being misappropriated for the benefit of others, with minimal benefit for the local community. Writing this, I am not only speaking as one person in my generation, but for those who will come after me - for those whose island will also be changed irrevocably.

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: E30F5480

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and associated documentation, highlighting several material 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 noted for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. Concerns have been raised regarding the scale, proximity, and design of the project, as these factors call into question its alignment with statutory requirements, national policy, and sustainable development principles.

A critical issue is that the application does not provide a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain undefined. The flexible design framework employed complicates the understanding of likely significant effects, and the reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal is marked by clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are directly linked to the statutory tests necessary for consent and undermine the capability of the competent authority to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal, characterised by large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species has significant deficiencies, leading to an incomplete understanding of the ecological receptors in the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data used is inadequate. The methodologies employed do not effectively capture important aspects such as species presence, behaviour, and habitat use, which undermines the assessment's ability to evaluate impacts accurately.

A notable gap is the treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise their use of coastal areas for foraging and movement. Without a proper assessment of their core foraging range and behaviour, the potential impacts of construction activities, noise, and increased human activity remain insufficiently evaluated. This flaw weakens the conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks is hampered by the over-reliance on aerial surveys, which carry a significant risk of detection bias, particularly under Atlantic conditions. Such reliance likely leads to an underestimation of their presence, especially in light of established land-based observations that demonstrate frequent use of these waters. The failure to integrate or adequately consider this data results in a further incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects rest on assumptions rather than solid evidence. The lack of sufficient baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, there remains a level of uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out in the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty prevents the exclusion of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Given these circumstances, it is clear that consent cannot be granted lawfully.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies impede a robust evaluation of impacts on marine ecology and protected species and contribute to the overall conclusion that the application lacks a sound evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration raises serious concerns regarding its reliability and adherence to regulatory requirements. It is situated in key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which are essential for internationally important seabird populations. However, the ornithological assessment is flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. Despite the presence of these critical habitats, the application does

not sufficiently demonstrate that the seabird species will not be adversely affected.

A troubling contradiction within the application is evident, as the developer claims no significant adverse effects while also advancing a Habitats Regulations derogation case, which is warranted only when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions lack support from the available evidence. Additionally, the assessment fails to adequately consider the implications of displacement, collision risk, or habitat loss, especially for vulnerable species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, particularly given the incomplete baseline data and the insufficient understanding of species behaviour.

The location of the turbines within a recognised migratory corridor introduces further risk, effectively acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not thoroughly assessed, raising concerns for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to confirm no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and modelling limitations means the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, inhibiting a lawful conclusion in favour of consent.

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

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings obstruct a thorough evaluation of impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity in the application is fundamentally flawed, overlooking the West Lewis coastline as a dynamic cultural landscape intertwined with environment, language, tradition, and community. It adopts a narrow view of heritage, treating it as disconnected, static assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

Significantly, culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas are classified merely as static features despite being active burial grounds and sites of spiritual practice. This oversight neglects their ongoing use and significance,

leading to an inadequate evaluation of cultural impacts and disregarding their essential role in community life.

Moreover, the application fails to address intangible cultural heritage elements, such as the Gaelic language and the community's deep-rooted connection to the coastal environment. These critical aspects are absent from the assessment and represent a considerable omission. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and contravenes established principles of participation concerning cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a significant procedural failure, contravening statutory requirements under the Islands (Scotland) Act 2018. This gap precludes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic effects on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to recognise living cultural practices represent a departure from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, resulting in an application that fails to establish a sufficient basis for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical issue that undermines the integrity of the evaluation process. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This absence creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the extent of social risks identified through the developer's own research.

Initial summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are a direct result of community engagement and are not speculative in nature. However, the non-disclosure of the complete assessment limits the potential for proper scrutiny of the findings and reduces the opportunity to assess their significance

in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with the developer noting "cultural loss" in their findings. Despite this recognition, these social impacts have not been adequately incorporated into the primary application or weighted appropriately. The failure to provide the full Social Impact Assessment obfuscates the true human and social costs associated with the development.

This deficiency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when considering potential effects on community character and functioning. The lack of a complete dataset impairs the application's ability to furnish a comprehensive evidential basis for evaluating the balance between benefits and potential harm.

From a policy standpoint, the application does not adequately demonstrate compliance with the National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and avoid harm, yet the evidence at hand points to existing adverse effects that have not been fully addressed. Without the full assessment, demonstrating compliance with this policy is unfeasible.

The procedural ramifications are considerable. The competent authority cannot 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 fulfil the evidential requirements of the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation precludes a lawful determination and reinforces the position that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts presented in the application is severely lacking, failing to adequately address both the extent of changes anticipated and the sensitivity of the surrounding environment. The character of the West Lewis coastline, characterised by an open Atlantic horizon and a sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines situated near the shoreline. This would create a pervasive industrial presence that would lead to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately captures the scale of visual change that would result from the turbines. Their size and proximity would lead to domination of views from residential areas, historic sites, and prominent coastal locations, thereby negatively affecting visual amenity and undermining the defining characteristics of

naturalness and remoteness. The assessment lacks an accurate portrayal of the impacts and their significance within this sensitive landscape context.

Concerns also arise from the methodologies employed in selecting and presenting visual viewpoints. Evidence suggests that these viewpoints may not effectively depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage locations and valuable landscapes. Consequently, there is a risk that the magnitude of visual impact has been understated, which diminishes the reliability of the assessment.

Moreover, there is a failure to consider the interconnected relationships between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that shares visual and spatial connections with the Atlantic horizon. The assessment treats these heritage assets as separate entities, neglecting their interdependence, which leads to an incomplete evaluation of the impact on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are perceived and severing their connections to the natural horizon. This situation represents not only a visual detriment but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4, which mandates the protection of natural environments and historic assets. The extent of the proposed changes is incompatible with the obligation to maintain landscape character, visual amenity, and the context surrounding culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the alterations to the landscape would be fundamental and permanent, rather than something that could be sufficiently addressed through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of the impact, the sensitivity of the environment, and the interconnectedness of the landscape and heritage. These shortcomings inhibit a reliable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to disturbances. The application currently lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, which

are essential for evaluating the likely environmental effects associated with the substantial seabed preparation and installation works in this high-energy Atlantic environment. Instead, the proposal relies on mitigation and contingency measures to be prepared after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

There exists significant 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. Furthermore, while the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not provide adequate details on prevention, control, or monitoring measures. This lack of information is particularly concerning given the sensitivity of the receiving environment.

The absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application fails to allow for the evaluation of whether suitable safeguards are established to address potential pollution events. Such a deferral introduces procedural risk and hinders the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the omission of critical environmental safeguards contravenes the requirements set forth by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are assessed prior to consent; failure to provide this information means a lawful determination cannot occur. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts results in a materially deficient assessment. These deficiencies inhibit a thorough evaluation of construction and pollution risks, supporting the assertion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The application for development lacks a thorough assessment of both dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will create a continuous "wall of light" that will disrupt the natural night-time environment across the western horizon.

There is no evaluation of how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the role of dark skies in the area's identity and in promoting emerging sectors such as astro-tourism. The failure to assess these impacts represents a clear omission

in the overall assessment of the landscape and environment.

Moreover, the application does not include any analysis of the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly vulnerable to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a study on phototaxis means there is no consideration of how the aviation lighting might endanger these species or contribute to higher mortality rates.

Compounding this issue is the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Kittiwakes, for example, may be active at night while foraging or migrating, making them susceptible to disorientation from artificial lighting. The lack of site-specific data for night-time increases the uncertainty regarding ecological impacts.

Without a proper evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites might be negatively impacted. The necessary standard of evidence to confidently rule out adverse effects is not met, thus invoking the precautionary principle and hindering a lawful decision.

From a policy standpoint, this omission contradicts National Planning Framework 4, which focuses on the protection of natural areas and environmental quality. It further detracts from the overall assessment of the impacts on landscape and seascape, since the character of night-time is an essential aspect of the environment.

Ultimately, the lack of an assessment regarding dark skies and nocturnal wildlife represents a serious gap in evidence. The absence of baseline data, impact modelling, and species-specific evaluations leaves the application incomplete and unable to support a lawful determination.

TOURISM

The evaluation of tourism impacts in the application is significantly lacking and does not adequately address the economic and social repercussions for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and sense of isolation. It is noted that 86% of visitors are attracted to the scenery, yet there is no quantitative analysis provided regarding how the introduction of large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced substantial growth, with revenues rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not explore how the industrialisation of the seascape and a potential decline in environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise a well-established and

expanding sector.

Moreover, the assessment neglects to recognise the significance of environmental quality in promoting tourism, particularly the value of pristine landscapes and dark skies for enhancing visitor experiences and the growth of emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, resulting in a considerable gap in understanding the impacts on a recognised and burgeoning aspect of the local economy.

Given the limited economic diversification within the island community, the oversight in evaluating tourism impacts has broader ramifications for employment, local enterprises, and community sustainability. The absence of a comprehensive Island Communities Impact Assessment indicates that these economic vulnerabilities have not been appropriately examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to show adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic goals that identify tourism as a key growth sector, lacking the necessary evidence for the competent authority to evaluate the economic consequences of the proposed development.

In summary, the combined failures to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic reliance create a significant evidential gap. This deficiency hinders a thorough assessment of the economic implications and leads to the conclusion that the application is insufficient.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the requirements for sustainable development according to statutory obligations, national policy, and evidential standards. It raises similar concerns to those that resulted in the refusal of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable scale of industrialisation. This current application comes under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidence provided for this application. It lacks comprehensive baseline data and continues to employ an undefined design envelope. Mitigation measures have not been clearly outlined, and key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, failing to clarify likely significant effects or residual impacts.

Procedural shortcomings are also apparent. The missing Island Communities Impact Assessment violates the statutory duty under the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment further complicates matters. These issues

hinder the competent authority's ability to assess effects on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4 by not adequately protecting biodiversity, natural areas, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties regarding environmental risks that could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

In summary, the application is unfit for determination both procedurally and substantively. The lack of information, combined with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent for this application or invoke the appropriate regulatory provisions to obtain the missing information.

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

Additional Comments

Plans like this continue to ignore the local communities that will live with the impacts for generations. Ignoring the locals wishes and the impacts on wildlife in the name of being 'green' is unacceptable.

The voices and choices of those who live there and are fighting for their islands wildlife both on land and sea, their connection to the place they live, their economy, amongst other reasons, **MUST** be what makes this decision. It should never be based on the profits of the people building the wind farms, or about how the government can hit their green targets.

Listen to those who will live with negative impacts of these plans, and choose the people and wildlife over profits and ticked boxes.

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: F1F834B8

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental impact, cultural considerations, and procedural aspects. The development site is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and robust cultural heritage. Concerns about the scale, proximity, and design of the proposed wind farm raise serious questions regarding its alignment with statutory obligations, national policies, and the principles of sustainable development.

The submission lacks a comprehensive evidential basis necessary for a lawful decision. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Many important elements of the proposal remain undefined. The flexible design framework employed makes it difficult to ascertain potential significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts involved, and assertions of negligible or non-significant effects lack robust supporting evidence.

There are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. It has not demonstrated adherence to national requirements aimed at protecting biodiversity, climate considerations, and environmental integrity. These conflicts relate directly to the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal in this particular location poses additional challenges, with large turbines positioned alarmingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy underscore that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle is paramount.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal relies on an Environmental Impact Assessment Report that is materially deficient, lacking a full, transparent, or reliable account of the potential environmental effects. A significant issue arises from the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This flexibility introduces considerable uncertainty and inhibits a consistent application of a worst-case scenario, thus compromising the integrity of the assessment. As a result, the impacts presented may not accurately reflect the development that will ultimately be constructed, hindering both the public and the competent authority from grasping the true extent of the environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be addressed later prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable, undermining the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings 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 adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the existence of gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder 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 development raises significant concerns regarding the adequacy of its assessment of alternatives, which fails to meet the statutory requirements of the

Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives that take into account environmental effects, the application merely outlines the evolution of the project. This narrative approach does not provide assurance that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

The application lacks a transparent and evidence-based comparison of alternative offshore locations, development scales, and design configurations. Notably, it does not demonstrate that the developer has thoroughly considered the potential benefits of placing turbines further offshore, where the visual, ecological, and coastal impacts could potentially be mitigated. The West Lewis coastline is particularly sensitive, and the significance of proximity to the shore in assessing impact necessitates a thorough analysis, which is currently absent. This omission prevents any determination that the proposed site represents the least damaging option available.

Furthermore, the deficiencies extend to the assessments related to cable routing and landfall. There is inadequate evidence to suggest that alternative routes have been properly explored to minimise impacts on sensitive receptors, including sites of cultural and spiritual importance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the project has not applied mitigation by design, instead relying on post-design mitigation measures. Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist.

From a policy standpoint, these deficiencies undermine compliance with National Planning Framework 4, particularly in terms of safeguarding natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that reinforces the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment conducted regarding marine ecology and protected species is significantly flawed, lacking a complete and reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is known for its high sensitivity and biological activity; however, the baseline data gathered is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat usage of various species. Consequently, there is a lack of a sound evidential basis for evaluating the potential impacts of the proposed development.

Notably, there is a critical oversight concerning otters, which are designated as a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate

assessment of the potential impacts resulting from construction disturbances, noise, and increased activity levels. This oversight diminishes the credibility of any conclusions made regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, revealing significant gaps in evidence and internal contradictions that undermine its findings. Key foraging areas and migratory pathways critical to internationally important seabird populations on the west coast of the Isle of Lewis are inadequately addressed. Despite the serious decline of many of these species, the application fails to meet the necessary evidential standards to prove that they will not suffer adverse effects.

Within the application, there exists a troubling contradiction. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation, a process that is only required when significant harm is anticipated. This contradiction raises doubts about the assessment's credibility and indicates that the conclusions drawn lack sufficient support from the evidence provided.

Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. It inadequately acknowledges the importance of these feeding grounds, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding regarding behavioural responses.

The proposed siting of turbines within a recognised migratory corridor introduces a substantial risk by creating a barrier in a primary flight path utilized by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of continuous mortality within this corridor or the possible impacts on species that have relatively small global populations.

Regulatory concerns arise as the application does not fulfil the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which prevents a lawful conclusion supporting consent.

Additionally, the deficiencies noted signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will remain unaffected places the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity in the application is fundamentally flawed, overlooking the West Lewis coastline as a dynamic cultural landscape intertwined with environment, language, tradition, and community. It adopts a narrow view of heritage, treating it as disconnected, static assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

Significantly, culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas are classified merely as static features despite being active burial grounds and sites of spiritual practice. This oversight neglects their ongoing use and significance, leading to an inadequate evaluation of cultural impacts and disregarding their essential role in community life.

Moreover, the application fails to address intangible cultural heritage elements, such as the Gaelic language and the community's deep-rooted connection to the coastal

environment. These critical aspects are absent from the assessment and represent a considerable omission. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and contravenes established principles of participation concerning cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a significant procedural failure, contravening statutory requirements under the Islands (Scotland) Act 2018. This gap precludes the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic effects on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage and the failure to recognise living cultural practices represent a departure from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly examined, resulting in an application that fails to establish a sufficient basis for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application demonstrates a significant deficiency in assessing social impacts, health, and wellbeing, undermining the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included engagement with local residents through focus groups. However, the failure to publish the full report results in a critical evidential gap, obstructing both public understanding and the competent authority's ability to grasp the full extent of the social risks identified by the developer's research.

Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern linked to the scale and proximity of the proposed development. These impacts stem from direct engagement rather than speculation. Nevertheless, the lack of disclosure of the complete assessment hinders proper scrutiny of these findings and limits the capacity to assess their significance in the decision-making process.

Moreover, there is evidence that the proposed development is viewed as a threat to community identity and cohesion, with the term “cultural loss” explicitly mentioned in the developer’s findings. Despite this acknowledgment, these impacts have not been adequately integrated into the application or given the necessary weight. The non-

disclosure of the full Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency fundamentally compromises the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be at stake. By withholding the full dataset, the application fails to provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and mitigate harm, yet the available evidence highlights existing adverse effects that remain undisclosed. In the absence of 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 without access to the entire Social Impact Assessment. This omission constitutes a material failure within the application and does not satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, combined with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the argument that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application demonstrates significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately reflect the sensitivity of the environment and the scale of change. The open Atlantic horizon, undeveloped character, and strong sense of remoteness that define the West Lewis coastline would be fundamentally altered by the introduction of large-scale turbines in close proximity to the shoreline. This would create a continuous and dominant industrial presence, leading to a permanent and irreversible transformation of the landscape.

Moreover, the proposed development does not sufficiently represent the magnitude of the visual change. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns further undermine the reliability of the visual assessment. There is evidence suggesting that the selection and presentation of visual viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios,

particularly concerning key cultural heritage sites and high-value landscapes. This risk of understating the magnitude of visual impact raises serious questions about the overall assessment's credibility.

A critical oversight is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting linked to the Atlantic horizon through visual and spatial relationships. Treating these assets as isolated fails to recognise 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, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents a significant cultural and spatial harm that has not been adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change presented is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The failure to conduct a thorough worst-case assessment further weakens any claim of compliance with relevant policies.

Finally, the impacts identified in the application cannot be effectively mitigated. Due to the height, scale, 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.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of the environmental impacts associated with the proposed construction and pollution management is insufficient and lacks the necessary detail to accurately evaluate the likely effects on the environment. The project entails significant seabed preparation and installation activities in a high-energy Atlantic context, 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 slated to be developed after consent is granted, which hinders any substantial assessment of their potential effectiveness or adequacy.

This reliance on unspecified future measures raises particular concerns given the sensitivity of the local 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 acknowledges various risks, such as the mobilisation of sediment and accidental spills of chemicals or oil, yet it fails to offer adequate information on how these risks will be mitigated, controlled, or monitored.

There is also a lack of clarity regarding the magnitude and behaviour of sediment plumes that may arise from seabed disturbances and cable installations. Without robust modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these potential impacts. This uncertainty further extends to marine species and habitats that have already been identified as sensitive in the broader environmental assessment.

Compounding these issues is the absence of well-defined emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and undermines the competent authority's capacity to assess the adequacy of environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the obligations set forth in the Environmental Impact Assessment regime. Significant effects and their mitigation must be evaluated prior to consent; therefore, the absence of this information renders a lawful determination unachievable. Additionally, the application does not adequately demonstrate compliance with relevant policy requirements regarding environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainties surrounding potential impacts lead to a materially deficient assessment. These shortcomings inhibit a thorough evaluation of construction and pollution risks, thereby reinforcing the view 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, 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 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 absence of an assessment regarding dark skies and nocturnal wildlife is a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, creating a continuous and intrusive "wall of light" that would drastically change the night-time atmosphere.

There has been no examination of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This neglect is particularly troubling given the significance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to evaluate these impacts highlights a clear deficiency in the overall landscape and environmental assessment.

More importantly, the proposal does not consider the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and a higher risk of collisions. The application lacks a lighting impact assessment or phototaxis study, meaning it does not address how aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or their associated risks. Kittiwakes, for instance, may forage or migrate at night and are equally susceptible to disorientation caused by artificial lighting, yet this risk remains unexamined. The lack of specific night-time data creates a critical void in understanding ecological impacts.

Without an evaluation of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would face adverse consequences. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 regarding the preservation of natural areas and environmental quality. It also detracts from the comprehensive evaluation of landscape and seascape effects, as night-time character is a fundamental aspect of the environment.

Overall, the complete lack of assessment concerning dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application inadequate and unable to support a lawful determination.

TOURISM

The evaluation of tourism impacts is significantly inadequate and does not address the economic and social repercussions for a vital component of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and prevailing sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contributions.

Tourism has experienced notable growth, rising from £65 million in 2017 to over £81.5 million, sustaining more than 1,000 jobs and representing up to 16% of the island's economy. In spite of this progress, the application does not simulate how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in fostering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience, alongside emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a substantial gap in the understanding of impacts on a recognised and flourishing segment of the local economy.

In an island community characterised by limited economic diversification, the lack of an assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to produce a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as stipulated 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 necessity to exhibit net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to present sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

In summary, the combined deficiencies in quantifying tourism impacts, analysing environmental drivers of visitor behaviour, and considering the island's economic dependency lead to a substantial evidential gap. This hinders a thorough evaluation of economic effects and culminates in the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as mandated by statutory duties and national policy. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address these concerns adequately.

There are significant gaps in the evidential basis provided for the application. The reliance on an undefined design envelope, unspecified mitigation measures, and the lack of crucial impact assessments, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This inadequacy impedes a thorough understanding of the potential significant effects and residual impacts associated with the project.

Moreover, procedural shortcomings are evident, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory requirements under the Islands (Scotland) Act 2018. The non-disclosure of a complete Social Impact Assessment is another critical omission. These failures 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 also misaligned with the National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, nor does it show that health and wellbeing impacts are manageable. Furthermore, the lack of tourism impact modelling means that a net economic benefit cannot be substantiated. The cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary

principle. This failure prevents a lawful determination that impacts are acceptable.

The proposed development would also effect substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the degradation of dark skies, disruption to cultural and visual connections, and adverse impacts on tourism are permanent consequences that cannot be mitigated effectively.

In conclusion, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, coupled with policy discrepancies and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority should therefore refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Additional Comments

As a island born and bred on the Isle of Lewis, I strongly object to the plans that are outlined for the off shore windfarm.

We all know of the massive negative implications of this project, including the people who are driving those plans through, this is why it is so worrying.

Those plans have been worked through long ago,...we are not blind.

This project is only to benefit big buisness at the end of the day.

Our Island and surrounding seaboard is precious in all sorts of magnificent ways and those plans are setting out to destroy for greed.

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: A6A15CBB

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 is fundamentally flawed and lacks a comprehensive, transparent, and dependable account of the potential environmental impacts associated with the proposal. The adoption of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, introduces considerable uncertainty. This uncertainty hinders a consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the projected impacts may not accurately reflect the development that is ultimately realised, which obstructs both public understanding and the ability of the competent authority to grasp the full extent of the environmental consequences.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach seeks consent on the premise that any environmental harm will be rectified at a subsequent stage, which complicates a meaningful evaluation of their effectiveness and the assessment of residual impacts. Such a postponement of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and their mitigation must be distinctly identified before a determination is made.

Significant evidential deficiencies also exist within the application, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than robust, site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially in instances where conclusions regarding negligible or non-significant effects are drawn 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.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to eliminate 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, particularly concerning biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

In summation, the reliance on an undefined design envelope, the absence of specific mitigation measures, and the notable gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The application suffers from significant deficiencies in its assessment of marine ecology and protected species, failing to offer a complete or trustworthy understanding of ecological receptors in the West Lewis coastal environment. This area is characterised by a highly sensitive and biologically active marine system, yet the baseline data remains incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a robust evidential basis for evaluating potential impacts.

One major oversight pertains to otters, classified as a European Protected Species. The application does not sufficiently recognise or assess their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate evaluation of the potential effects stemming from construction disturbance, noise, and increased human activity. This limitation undermines any conclusions drawn regarding the absence of significant effects on the otter population.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence. This is especially concerning when compared to established land-based observations that indicate frequent usage of these waters. Neglecting to incorporate or adequately consider such data yields an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological flaws result in conclusions of negligible or non-significant effects being based more on assumptions than on sound evidence. The lack of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This absence of clarity fosters uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to align with the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as it does not properly identify or assess protected species. The uncertainty introduced by these deficiencies precludes the ability to exclude adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with this application is deeply flawed, presenting significant gaps in evidence and inconsistencies that undermine its conclusions. It is critical to acknowledge that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate convincingly that these species will not suffer adverse effects. The development sits within essential foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A glaring contradiction arises within the application, where the developer asserts there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious doubts about the assessment's reliability, indicating that its conclusions lack the support of the necessary evidence. The assessment falls short of providing sufficient proof that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed risk underestimating mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

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

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to affirm that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, paired with data deficiencies and modelling shortcomings, indicates that the standard of beyond reasonable scientific doubt has not been reached. This situation invokes the precautionary principle, ultimately preventing a lawful conclusion in favour of consent.

The identified deficiencies also suggest 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 opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A major flaw is evident in the handling of culturally significant locations, particularly the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and spiritual practices. The assessment mischaracterises these spaces as static, ignoring their continued use and the implications of development on their surroundings. This oversight results in an incomplete understanding of cultural impacts and neglects their essential role in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is severely lacking, leading to significant concerns about the adequacy of the evaluation. Although the developer engaged in a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence restricts both public insight and the competent authority's understanding of the social risks highlighted in the developer's own research.

Local residents are already feeling measurable stress, anxiety, and worry due to the scale and proximity of the proposed development. These effects are based on direct engagement with the community and are not speculative. However, the absence of the complete assessment hampers thorough scrutiny of the findings and limits the ability to evaluate their importance in the decision-making process.

Moreover, there is a perception among community members that the proposal threatens their identity and cohesion, with indications of "cultural loss" appearing in the developer's findings. Unfortunately, these impacts have not been adequately considered in the main application, nor have they been given the weight they deserve. The decision to withhold the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application fails to provide a solid evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Development should foster positive health outcomes and mitigate harm; however, the evidence currently suggests pre-existing adverse effects that have not been adequately disclosed. Therefore, without the full assessment, it is impossible to confirm compliance with this policy.

The implications for procedure are significant, as the competent authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts results in an incomplete and unreliable assessment. This inadequacy obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts reveals significant deficiencies, failing to capture the extent of change or the sensitivity of the

environment. The West Lewis coastline features an open Atlantic horizon and an undeveloped character that offers a strong sense of remoteness. The proposal for large-scale turbines situated near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and causing permanent and irreversible changes to the landscape.

Moreover, the application does not adequately illustrate the magnitude of the anticipated visual change. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to adequately represent the level of this impact or its significance in relation to such a sensitive landscape.

Methodological issues further compromise the reliability of the visual assessment, particularly concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, thereby questioning the overall reliability of the assessment.

Additionally, there is a notable shortcoming in recognising the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a larger landscape setting, linked visually and spatially to the Atlantic horizon. The current assessment treats these assets as isolated entities rather than acknowledging their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape threatens to sever these critical relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not just a visual impact, but also a broader cultural and spatial detriment that the application has not sufficiently addressed.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic assets. The extent of the proposed changes does not align with the need to protect landscape character, visual amenity, and the context of culturally significant sites. Furthermore, the absence of a comprehensive worst-case assessment severely undermines any assertion of compliance with policy requirements.

Lastly, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and inescapable. Thus, the resulting change is fundamentally permanent and cannot be reduced to an acceptable level through any form of mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans, along with undefined mitigation measures, renders the assessment of construction and pollution risks materially deficient. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on future mitigation and contingency measures to be formulated post-consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future actions is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventative, control, or monitoring measures for these risks.

Further uncertainty exists 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 consequences of these impacts. This uncertainty also pertains 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 until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are established to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and proposed mitigation measures must be assessed prior to consent; the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the deficiencies noted in the application—the lack of defined mitigation measures, insufficient detail in management plans, and uncertainty surrounding potential impacts—strongly indicate that a robust evaluation of construction and

pollution risks is not feasible, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal's assessment regarding fisheries and marine life is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a rich marine ecosystem and support an active fishing industry. However, the application does not sufficiently demonstrate how these vital uses and habitats can be safeguarded from significant disruption.

A major concern lies in the assumption that fishing activities can be relocated without repercussions. The application lacks evidence to confirm that alternative fishing grounds exist, are accessible, or can withstand increased pressure. This oversight is critical, as displacing fishing activities may lead to overfishing in other areas, resulting in broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods they sustain remain poorly understood.

The proposal also poses considerable risks to marine species due to underwater noise generated during construction. Prolonged high-energy hammer piling is anticipated to disturb species over extensive distances, impacting populations such as dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population raises grave concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Furthermore, there exists a contradiction within the application; while the need for licences to harm European Protected Species is recognised, impacts are simultaneously characterised as negligible. This inconsistency undermines the assessment's credibility and raises serious questions about compliance with the Habitats Regulations, particularly concerning anticipated harm that necessitates legal authorisation.

Additionally, the assessment neglects to address 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 understand the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to comply with National Planning Framework 4 and the National Marine Plan. It does not adequately demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, hindering any conclusion that the project would represent sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment

incomplete and untrustworthy. These deficiencies impede a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project includes offshore turbines and various onshore works, which are part of a single integrated initiative. However, the assessment of these onshore infrastructure components is incomplete and does not account for the full impacts of the project. The offshore and onshore elements are intrinsically linked but are examined separately, leading to a fragmented understanding of the environmental and socio-economic effects.

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment for the proposed development fails to address the assessment of dark skies and nocturnal wildlife, representing a substantial omission. The introduction of permanent red aviation lighting will be visible over long distances and will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of residents and visitors. This oversight is particularly concerning, as dark skies play a crucial role in the area's identity and in the development of emerging tourism sectors, such as astro-tourism. The omission leads to a clear gap 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 are highly sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not adequately consider how the aviation lighting might affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not reflect 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 potential impact remains unassessed. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, this neglect undermines the broader assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife presents a

significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The economic contribution of tourism to the Isle of Lewis is significant, with its value increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this growth, the assessment of tourism impacts related to the proposed development is materially deficient. The application acknowledges that 86% of visitors are attracted by the area's scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

Furthermore, the assessment fails to consider the critical role that environmental quality plays in supporting tourism. The importance of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism, has not been adequately evaluated. The lack of a Dark Skies Assessment further exacerbates this issue, leaving a significant gap in understanding the potential impacts on a growing segment of the local economy.

In an island community with limited economic diversification, the neglect 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 properly 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 requirement to show a net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This lack of thorough analysis undermines the ability to robustly evaluate economic effects and suggests that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development, as it does not align with statutory obligations, national policy, or evidential standards. This proposal mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being introduced under an enhanced policy framework that emphasises biodiversity,

peatland protection, landscape integrity, and community wellbeing, it lacks a solid evidential foundation necessary for determination.

There are significant gaps in the baseline data, which are compounded by the use of an undefined design envelope and a reliance on unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete and fails 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 constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is 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.

The proposal contradicts National Planning Framework 4, as it does not demonstrate sufficient protection for biodiversity, natural environments, and cultural heritage. It also falls short in evidencing acceptable health and wellbeing impacts and lacks tourism impact modelling, which is essential for establishing a net economic benefit. The cumulative effects of both offshore and onshore elements have not been adequately evaluated, resulting in obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially severe. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidence required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

This proposal would also lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and negative impacts on tourism present permanent changes that cannot be adequately mitigated.

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

It is requested that the application for the Spiorad na Mara Offshore Wind Farm is 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: 59DA247F

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to significant evidential deficiencies, including gaps in baseline data and limitations in methodology, which rely on assumptions rather than site-specific evidence. This creates uncertainty around the scale and significance of impacts, especially where conclusions suggest negligible or non-significant effects without adequate supporting data. Such inadequacies hinder a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that does not align with statutory requirements.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a complete, transparent, or reliable overview of the likely environmental effects associated with the proposal. The implementation of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, further complicates the situation by introducing uncertainty. This lack of clarity undermines the integrity of the assessment and means that the impacts described may not truly reflect the development that will be constructed, thereby preventing both the public and the competent authority from fully grasping the environmental implications.

Consent is sought on the basis that environmental harm will be mitigated at a later stage, which is procedurally unacceptable. This approach conflicts with the objective of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly defined before any determination is made. The absence of defined mitigation measures, monitoring strategies, and management plans further exacerbates the problem, leaving the assessment incomplete and unreliable.

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

In summary, the combination of an undefined design envelope, lack of specified mitigation, and substantial gaps in baseline data leads to an Environmental Impact Assessment Report that is not only incomplete but also unreliable. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects and place the competent authority in a position where it cannot appropriately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements set out in the Environmental Impact Assessment regime. It lacks a structured comparison of realistic alternatives based on environmental effects, instead presenting a narrative of project evolution. This method does not confirm that less harmful options have been properly identified, assessed, and chosen over more

damaging solutions.

There is no clear, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline is particularly sensitive, and the significance of proximity to shore in determining impact means that the absence of such analysis makes it impossible to conclude that the proposed location is the least damaging option.

The deficiencies in the application extend to cable routing and landfall assessment as well, with insufficient evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive areas. This includes places of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis indicate that mitigation by design has not been employed, relying instead on measures after the design phase.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to offer a thorough and dependable understanding of the ecological receptors present. This region is recognised as a highly sensitive and biologically vibrant marine system; however, the baseline data available is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat usage of various species, leading to an assessment that lacks a solid evidential basis for evaluating potential impacts.

A significant shortcoming within the application pertains to otters, classified as a European Protected Species. There is insufficient recognition and evaluation of their active use of coastal areas for foraging and movement. The oversight of their core foraging range and behavioural patterns results in a failure to appropriately assess the potential effects of construction disturbance, noise, and increased activity, thereby undermining any conclusions regarding the absence of significant impacts on this

species.

Moreover, the assessment of basking sharks is similarly deficient, as it relies heavily on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This methodology is prone to underestimating the presence of these sharks, particularly when compared to established land-based observations that demonstrate frequent usage of these waters. The lack of incorporation or proper consideration of such relevant data results in an incomplete baseline and diminishes the credibility of the conclusions drawn.

Due to these methodological inadequacies, the conclusions regarding negligible or non-significant effects are grounded in assumptions rather than solid evidence. The deficiency of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, this engenders uncertainty concerning the actual risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has failed to properly identify or assess the protected species involved. The resulting uncertainty precludes the dismissal of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, the granting of consent cannot be lawfully justified.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions leads to an unreliable assessment. These shortcomings inhibit a rigorous evaluation of the impacts on marine ecology and protected species, ultimately contributing to the overarching determination that the application does not rest on a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of ornithology associated with this application reveals critical flaws, characterised by internal inconsistencies and notable gaps in evidence. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to provide the necessary evidential support to demonstrate that these species will remain unaffected. It is noteworthy that the development is situated in key foraging areas and along migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss have not been thoroughly evaluated.

There is a significant contradiction within the application, as the developer asserts that there will be no significant adverse effects while simultaneously preparing a Habitats Regulations derogation case, which typically implies that significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence regarding the impact on

seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is inadequately recognised, and the modelling approaches used introduce uncertainty, particularly concerning species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses of these species are not completely understood.

The positioning of turbines within a recognised migratory corridor introduces further risk, creating a barrier within a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not provide an adequate assessment of the long-term consequences of sustained mortality within this corridor or consider the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to establish 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 met. This situation invokes the precautionary principle, thereby precluding a lawful conclusion in favour of consent.

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

In conclusion, the assessment is rendered unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These failings hinder a thorough evaluation of impacts and contribute to the overall finding 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, particularly concerning the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application takes a narrow view, treating heritage as isolated, static elements and neglecting their ongoing social, cultural, and spiritual significance within the community.

Significant shortcomings are evident in the handling of culturally important sites like the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and spaces for spiritual practice, yet the assessment reduces them to static features without acknowledging their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation leads to a partial evaluation of cultural effects and dismisses their integral role in community life.

Moreover, the assessment neglects 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 identity of the area but are entirely missing from the evaluation, creating a significant gap. Ignoring these factors undermines the ability to fully understand the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as an Indigenous People, yet the process of Free, Prior and Informed Consent has not been undertaken. The lack of meaningful engagement calls into question the legitimacy of the assessment and fails to honour established principles of participation in matters affecting cultural and environmental interests.

A critical procedural failure is the omission of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to examine the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear deviation from policy expectations.

In summary, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations creates a considerable evidential gap. The cultural impacts of the development have not been sufficiently evaluated, leaving the application without a solid foundation to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency in the assessment of social impacts, health, and wellbeing is evident and raises serious concerns regarding the validity of the evaluation. The developer has commissioned a Social Impact Assessment that involved focus groups with local residents, yet the full report remains unpublished. This absence of the complete report creates a significant evidential gap, preventing the public and the competent authority from gaining a comprehensive understanding of the social risks identified in the developer's own research.

There are indications that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are therefore based on observable facts rather than speculation. However, the failure to disclose the full assessment hinders proper scrutiny of these findings, limiting the ability to assess their

significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with the developer's findings indicating potential "cultural loss." Despite this recognition, such impacts have not been adequately incorporated into the main application or given the appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The lack of a comprehensive dataset in the application fails to provide a solid evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm; however, the evidence available suggests existing adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to demonstrate compliance with this crucial policy.

The procedural implications are profound. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This absence constitutes a material omission in the application, representing a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts regarding the proposed development is significantly lacking, failing to accurately convey the extent of change and the sensitivity of the environment involved. The West Lewis coastline is characterised by an open Atlantic horizon and an undeveloped nature that contributes to a strong sense of remoteness. The proposed large-scale turbines, located in close proximity to the shoreline, would create a continuous industrial presence that fundamentally changes this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application inadequately reflects the magnitude of visual change that the turbines would introduce. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the natural qualities that define the area. The assessment

does not sufficiently capture the significance of this impact in the context of such a sensitive landscape.

Methodological issues further complicate the assessment, particularly concerning the selection of visual viewpoints. There is evidence indicating that these viewpoints may not adequately represent sensitive receptors or worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been underestimated, which undermines the credibility of the assessment.

Additionally, the assessment fails to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated elements results in a failure to appreciate their interdependence and leads to an incomplete evaluation of impacts on their setting and cultural significance.

The potential industrialisation of the seascape would disrupt these vital relationships, altering how heritage assets are perceived and diminishing their connection to the natural horizon. This represents not only a visual concern but also a broader cultural and spatial impact that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of the intended changes is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment weakens any assertion of compliance with policy.

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

Collectively, these issues demonstrate that the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. Such deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this unique landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of the proposal is materially deficient due to the lack of detail concerning construction and pollution risks. There are substantial seabed preparation and installation works planned within a high-energy Atlantic environment; however, the application does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be prepared after consent is granted, which obstructs any

meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the environment in question. 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 associated with sediment mobilisation and potential chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures.

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

Moreover, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application undermines the competent authority's ability to evaluate whether appropriate safeguards exist for addressing pollution events. This introduces procedural risks and compromises the assessment of environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment regime. Significant effects and their mitigation must be assessed prior to granting consent, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively indicate that the assessment is severely deficient. These issues hinder a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents serious deficiencies in its assessment of fisheries and marine life, failing to deliver a comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate the ability to protect or maintain these habitats and uses without causing significant disruption.

A notable flaw in the application is the assumption that fishing activity can be relocated without adverse effects. There is no evidence provided to confirm that alternative

fishing grounds exist, are accessible, or can bear the additional fishing pressures. This significant omission could lead to overfishing in alternative areas and could have broader economic repercussions for the local fishing fleet. An absence of a clear, evidence-based assessment hampers the understanding of potential impacts on fisheries and local livelihoods.

Additionally, 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 expected to cause disturbances over large distances, impacting species such as dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population is alarming; yet the application downplays these effects without adequate supporting evidence.

There is an evident contradiction within the application, which acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially in areas where anticipated harm necessitates legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these compounded 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 show that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby hindering any conclusion that the proposal represents sustainable development.

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

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.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect

across the western horizon, fundamentally changing the night-time environment.

There is no assessment of how this lighting impacts visual amenity, landscape character, or the experiences of residents and visitors. This is a significant oversight, considering the importance of dark skies to the area's identity and the growing astro-tourism sector. The omission results in a clear gap in the overall landscape and environmental assessment.

More importantly, the application does not evaluate the impact 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 increase the risk of collision. The lack of a lighting impact assessment or phototaxis study means the proposal fails to consider how aviation lighting may harm these species or lead to higher mortality rates.

This issue is worsened by the use of daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or associated risks. Kittiwakes, for example, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting. 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 could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, engaging 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 lack of assessment undermines the overall evaluation of landscape and seascape impacts since night-time character is an integral part of the environment.

Overall, the absence of any evaluation of dark skies and nocturnal wildlife represents a significant evidential gap. The application lacks baseline data, impact modelling, and species-specific analysis, making it incomplete and unable to support a lawful determination.

TOURISM

The evaluation of tourism impacts is fundamentally inadequate and does not address the economic and social ramifications for a vital sector of the Isle of Lewis economy. This sector relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While the application acknowledges that 86% of visitors are attracted by scenery, it does not provide any quantitative assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced considerable growth, escalating from £65 million in 2017 to

over £81.5 million, and it now supports more than 1,000 jobs, accounting for up to 16% of the island's economy. However, the application fails to model the potential effects of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it remains uncertain whether the development would yield a net economic advantage or detract from a well-established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly regarding the vital role 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 further exacerbates this shortcoming, creating a considerable gap in understanding the impacts on an acknowledged and burgeoning segment of the local economy.

In an island community with limited economic diversification, the oversight in evaluating tourism impacts has broader consequences for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately 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 regarding economic impact and the necessity to illustrate net benefits. It is also at odds with strategic objectives that recognise tourism as a priority growth sector and fails to provide sufficient evidence for the competent authority to assess the economic implications of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and consider the economic dependence of the island leads to a significant evidential gap. This gap hinders a thorough assessment of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the critical issues that prompted the refusal of the Lewis Wind Power proposal in 2008, wherein the scale of industrialisation was deemed unacceptable. Despite being presented within a more robust policy context, which prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

A thorough evidential basis for determination is lacking. There are significant gaps in baseline data and an undefined design envelope, alongside an over-reliance on unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, are notably omitted. Consequently, the Environmental Impact Assessment is inadequate,

failing to facilitate a complete understanding of the likely significant effects and residual impacts.

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents 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, the proposal is at odds with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural habitats, and cultural heritage, fails to validate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, thereby obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, in some instances, lack internal consistency. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and inhibits a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal is poised to 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 implications for tourism signify permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

As a resident in Lewis I am appalled at the thought of the proposed gargantuan wind farm off the West Side going ahead.

I am shocked by the monstrous size of each turbine and the impact it will have on marine, bird and human life as well as the land.

We need to preserve and take care of our environment. It is delicate and must be protected.

There would be a daily impact on local communities which is unacceptable. Having each turbine lit up would be very disturbing for all at night.

Noise and light reflection would be awful.

It will affect the ability of locals to sell their homes and decrease their value. It will deter our young folk from staying on the island, and prevent those who went away to study from moving back to settle down.

We will have an even greater older aged weighted age of population with no one to look after them.

Tourism and local business will suffer.

The workers being brought here will put an even greater pressure on our already poor travel options on and off island. They will stretch resources further and take away more of our poor health service. It is already very difficult to get a doctor's appointment.

There is also the effect on the safety of our streets,.youth and homes.

Our islands are not bargaining chips, that don't matter and can be sold to the highest bidder.

We live here because we love it as it is.

If the proposal goes ahead, life on the Isle of Lewis will be changed beyond recognition. This is unacceptable. No one wants it. The consequences are unthinkable.

Build fewer, smaller turbines that will create local jobs, and provide cheaper energy for locals. That makes sense. Not lining the pockets of foreign investors and making the government look good for reaching renewable energy targets . NO thank you.

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: C642D4A1

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. Our concerns stem from a thorough review of the Environmental Impact Assessment Report and supporting documentation, revealing significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural integrity. The development site is situated off the west side of the Isle of Lewis, known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise profound questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for lawful determination. Important environmental data is absent, baseline information is limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used inhibits a clear assessment of likely significant effects, while reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation does not allow for a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Moreover, there are evident and substantial policy conflicts. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of this proposal, with large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy underscores the application's incompleteness, rendering it incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and lacks a full, transparent, and reliable account of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts presented may not accurately reflect the actual development constructed, which obstructs both the public and the competent authority from comprehending the true extent of the environmental effects.

Furthermore, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consent is thus being sought with the understanding that any environmental harm will be addressed at a later stage, which precludes a meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and is contrary to the objectives of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation are clearly established prior to any determination.

There are also major evidential shortcomings, such as gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority is not equipped to determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The proposed development lacks a thorough assessment of alternatives, failing to comply with the requirements of the Environmental Impact Assessment regime.

Instead of a structured evaluation of realistic options based on their environmental impacts, the application presents a narrative about the evolution of the project. This approach does not adequately show that less harmful alternatives have been identified, assessed, and preferred over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is seriously lacking. This region is known for its sensitivity and biological activity, yet the baseline data presented is inadequate. The methodologies employed do not sufficiently capture the presence, behaviour, or habitat usage of key species, leading to a lack of reliable evidence for evaluating potential impacts.

In particular, there is a significant oversight regarding otters, classified as a European Protected Species. The application fails to properly acknowledge their active utilisation of coastal areas for foraging and movement. As a result, the assessment does not adequately consider their core foraging range and behaviour, leaving the potential

impacts of construction disturbances, noise, and increased activity inadequately evaluated. Consequently, any claims regarding the absence of significant effects on otters are fundamentally undermined.

Furthermore, the assessment of basking sharks is flawed due to an overreliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic weather conditions. This methodology likely leads to an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The disregard for such critical data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings result in conclusions of negligible or non-significant effects being based on mere assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful analysis of cumulative and indirect impacts, including seasonal changes and interactions within the broader ecosystem. This introduces uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species are notably absent. The resulting uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant flaws, characterised by gaps in evidence and inconsistencies that call its conclusions into question. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in the development area, yet the assessment fails to rigorously evaluate issues such as displacement, collision risk, or habitat loss.

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence presented. Furthermore, the

assessment does not adequately establish that seabirds associated with protected sites, like the Lewis Peatlands and St Kilda, will be unaffected. It inadequately accounts for the significance of these feeding grounds, and reliance on modelling approaches injects uncertainty, particularly concerning species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality, especially where baseline data is lacking and behavioural responses are not fully understood.

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

From a regulatory viewpoint, the application fails to 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, coupled with data deficiencies and modelling weaknesses, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These inadequacies obstruct a thorough evaluation of potential impacts and contribute to the overall assertion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. The evaluation adopts a narrow perspective, viewing heritage merely as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal's social impacts on the community have not been adequately assessed. The developer produced a Social Impact Assessment, which included discussions with local residents, but the complete report has not been shared. This lack of transparency creates a significant gap in the evidence, preventing both the public and the responsible authorities from understanding the social risks revealed by the developer's research.

Residents are currently facing measurable stress, anxiety, and concern due to the project's size and its proximity to their homes. These effects stem from direct feedback and are not mere speculation. However, the withholding of the full assessment limits the opportunity for thorough examination of the results and restricts the capacity to assess their relevance in the decision-making process.

Furthermore, there is a perception that the proposal threatens community identity and cohesion, with the developer identifying "cultural loss" in their findings. Despite this recognition, these social impacts have not been properly included in the application nor have they been given adequate consideration. The failure to disclose the complete Social Impact Assessment conceals the true human and social consequences of the development.

This lack of transparency also weakens the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health ramifications is crucial for large developments, especially when they may affect the character and operation of the community. By not providing the complete set of data, the application does not offer a comprehensive evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not align with the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and avoid negative impacts, yet the existing evidence suggests adverse effects that remain undisclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The implications of these procedural shortcomings are considerable. The competent authority is unable to perform a thorough evaluation of socio-economic and health impacts without the complete Social Impact Assessment. This omission represents a significant flaw in the application and fails to satisfy the evidential requirements necessary under the Environmental Impact Assessment guidelines.

Overall, the decision not to disclose the full Social Impact Assessment, combined with clear evidence of negative impacts already felt by the community, leads to an incomplete and unreliable evaluation. This situation hinders a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposal significantly underrepresents the scale of potential impacts on the seascape, landscape, and visual environment. The West Lewis coastline is characterised by its open Atlantic views, an undeveloped nature, and a profound sense of remoteness. The introduction of large turbines near the shoreline would result in an industrial presence that would fundamentally change this character and lead to an irreversible alteration of the landscape.

The application lacks a thorough representation of the magnitude of the expected visual change. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historical sites, and popular coastal locations. This would detrimentally affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the extent of this impact or its significance within such a sensitive landscape context.

Methodological flaws are present in how visual viewpoints were selected and presented. There is evidence suggesting that these viewpoints may not encompass the most sensitive receptors or worst-case scenarios, particularly in relation to key cultural heritage sites and significant landscapes. This raises concerns that the projected visual impact may be understated, thus compromising the reliability of the assessment.

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

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

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of the proposed changes is incompatible with the requirements to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a solid worst-case assessment further diminishes any assertion of compliance with policy.

Furthermore, it is evident that the impacts identified cannot be effectively mitigated. Due to the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resulting changes would be 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 scale of potential impacts, the sensitivity of the receiving environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and underscore the conclusion that the proposal is not compatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This results in an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail to evaluate the likely environmental effects. The application relies on future mitigation and contingency measures that are yet to be

defined, precluding any meaningful assessment of their adequacy or effectiveness.

Concerns are amplified by the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from the 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, which could affect marine species and habitats already recognised as sensitive in the broader assessment.

The deficiencies extend to the absence of detailed emergency response procedures, which further complicates the evaluation process. Deferring contingency planning to a post-consent stage introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

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

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

FISHERIES AND MARINE LIFE

The proposal presents substantial risks to marine species, particularly due to the underwater noise generated during construction activities. High-energy hammer piling over a prolonged period is expected to cause disturbances over large distances, which could negatively affect species like dolphins. The predicted impact on a significant portion of the local bottlenose dolphin population is a major concern, yet the application minimises the significance of these effects without providing adequate supporting evidence.

Additionally, there is a clear contradiction within the application regarding the need for licences to permit harm to European Protected Species, while also describing the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when harm is anticipated to a level that would necessitate legal

authorisation.

The assessment of fisheries and marine life is notably insufficient, lacking a robust evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry, yet the application fails to demonstrate how these habitats and uses can be protected or maintained without significant disruption.

A critical concern is the assumption that fishing activities can be displaced without any consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of withstanding the additional pressure. This omission is particularly important, as displacement could lead to overfishing in other areas and might have wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and local livelihoods remain poorly understood.

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

From a policy standpoint, the application 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 existing marine users or avoid unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal embodies sustainable development.

In summary, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the application render the assessment incomplete and unreliable. These deficiencies obstruct a robust evaluation of 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 tourism assessment presented in this application is fundamentally inadequate, failing to consider the economic and social ramifications for a critical sector of the Isle of Lewis economy. With tourism heavily reliant on the area's wild coastline, pristine landscapes, dark skies, and a sense of remoteness, this oversight is alarming. Although the application indicates that 86% of visitors are attracted by the scenery, it lacks a detailed evaluation of how large-scale offshore infrastructure might impact visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. However, the application does not take into account how the industrialisation of the

seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the overall resilience of the economy. Without a thorough analysis, it remains unclear if the proposed development would provide a net economic benefit or harm this vital and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, particularly regarding unspoiled landscapes and dark skies, which are essential to enhancing visitor experiences. The lack of a Dark Skies Assessment exacerbates this shortcoming, leaving a critical gap in understanding the implications for an increasingly recognised and vital aspect of the local economy, such as nature-based and astro-tourism.

Given the limited economic diversification of the island community, the disregard for tourism impacts carries broader repercussions for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been sufficiently evaluated, contrary to requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4, especially concerning economic impact and the need to prove a net benefit. It also stands in conflict with strategic goals that highlight tourism as a key growth sector and does not supply adequate evidence for the competent authority to assess the economic consequences of the proposal.

All these factors combined reveal a significant evidential gap due to the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and recognise the island's economic reliance on tourism. This lack of thorough evaluation hinders a comprehensive understanding of the economic effects and underscores that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development according to statutory duties, national policy, and evidential standards. The application reiterates the main 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 rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determining the application. It lacks complete baseline data, utilises an undefined design envelope, depends on unspecified mitigation measures, and overlooks important impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

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

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

Environmental risks are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been met, necessitating the application of the precautionary principle and preventing a lawful conclusion that the 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, the disruption of cultural and visual relationships, and the impact on tourism would result in permanent effects that cannot be adequately mitigated.

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

Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be entirely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 80717917

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is founded on a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental, cultural, and procedural aspects. The development's location off the west side of the Isle of Lewis is notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity, all of which heighten concerns about the proposal's compatibility with statutory requirements and national policy.

Critical environmental data is conspicuously absent from the application, with limited and inconsistent baseline information. Key elements of the proposal remain undefined, which, combined with the use of a flexible design framework, creates ambiguity regarding the likely significant effects of the project. The reliance on unspecified mitigation measures further complicates the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, undermining the claims of negligible or non-significant effects, which lack robust evidence.

Moreover, the proposal presents clear and substantive policy conflicts. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, diminishing the ability of the competent authority to determine the proposal's acceptability from a policy standpoint.

The unprecedented scale of the proposal raises further concerns, as it involves large turbines situated in close proximity to the shoreline, which could result in significant landscape capacity issues, visual dominance, and environmental consequences. The combination of insufficient information, the reliance on undefined mitigation measures, and evident policy non-compliance illustrates that the application is incomplete and unsuitable for a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not provide a full or reliable account of the likely environmental effects of the proposal. It employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent assessment of worst-case scenarios. As a result, the integrity of the assessment is undermined, leaving both the public and the competent authority unable to grasp the true extent of environmental effects.

Consent for the application is sought based on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach postpones the evaluation of environmental harm, which prevents any meaningful assessment of effectiveness or residual impacts. Deferring key information to post-consent stages is procedurally inappropriate and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also considerable evidential gaps, including insufficient baseline data and methodological limitations, along with reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are concluded without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold outlined in 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 does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, which is essential under the Environmental Impact Assessment regime. It provides a narrative detailing the project's evolution instead of offering a reasoned comparison of realistic alternatives based on environmental effects. This failure to properly identify, assess, and select less harmful options in favour of more damaging solutions is a significant shortcoming.

There is no clear comparison of alternative offshore locations, development scales, or design configurations. The developer has not convincingly demonstrated that the possibility of placing turbines further offshore has been seriously considered, despite the likelihood that such a move would reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the importance of proximity to shore in assessing impacts highlight the critical nature of this analysis, and its absence raises doubts about whether the proposed siting is indeed the least damaging option.

Furthermore, the assessment of cable routing and landfall is inadequate, as it does not provide sufficient evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been appropriately implemented, relying instead on post-design measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a deviation from the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. Without a rigorous alternatives assessment, it cannot be asserted that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy compromises adherence to the National Planning Framework 4, particularly concerning the safeguarding of natural places, cultural heritage, and community wellbeing. The absence of a structured comparative assessment constitutes a material omission, reinforcing the overall conclusion that the application has not undergone adequate evaluation and is thus unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, which result in an incomplete and unreliable understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a sensitive and biologically active marine system, yet the baseline data remains insufficient. The methodologies employed fail to capture critical information regarding species presence, behaviour, and habitat use effectively. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A notable gap is evident in the treatment of otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal areas for foraging and movement. The oversight in considering their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential impacts from construction disturbance, noise, and increased activity. This omission undermines any claims regarding the absence of significant effects on this species.

Additional shortcomings are present in the assessment of basking sharks, where the reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This approach is likely to underestimate their presence, especially when compared to established land-based observations that demonstrate frequent usage of these waters. By failing to incorporate or adequately consider such data, the assessment creates an incomplete baseline that further weakens the reliability of the conclusions drawn.

These methodological flaws lead to assertions of negligible or non-significant effects being based more on assumptions than on robust evidence. The lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises serious concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced precludes any exclusion of adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle. Given these circumstances, it is clear that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises serious concerns regarding its reliability due to various methodological weaknesses and significant gaps in evidence. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. The application fails to adequately demonstrate that these species will remain unaffected, particularly given that the development is situated within crucial foraging areas and migratory pathways. Furthermore, the assessment does not thoroughly consider the risks associated with displacement, collision, or habitat loss.

A major inconsistency within the application is evident, as the developer asserts there will be no significant adverse effects while concurrently making a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction casts doubt on the validity of the assessment and suggests that the conclusions drawn are not substantiated by adequate evidence.

The methodologies employed are problematic; they may underestimate mortality rates,

especially given the lack of complete baseline data and an insufficient understanding of the behavioural responses of species such as Kittiwakes and Fulmars, which are already facing severe decline. The assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The importance of these feeding grounds is not sufficiently acknowledged, and reliance on modelling introduces further uncertainty.

Additionally, the proposed siting of turbines within a recognised migratory corridor poses a significant risk by potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately evaluate the long-term consequences of potential sustained mortality in this corridor, along with the impact on species with relatively small global populations.

From a regulatory viewpoint, the application does not meet the necessary evidential threshold to affirm 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, means the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and renders any conclusion in support of consent unlawful.

Overall, the identified deficiencies 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 remain unaffected directly contradicts national policy. Collectively, these issues render the assessment unreliable, leading 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 lacking, particularly in recognising the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. The application simplifies heritage into a collection of isolated and static assets, neglecting their ongoing social, cultural, and spiritual importance within the community.

A significant shortcoming is evident in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial and spiritual sites, yet the assessment erroneously classifies them as static elements, overlooking their continued use and significance, as well as the potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their integral role in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are essential to the area's

identity but have been completely overlooked, marking a considerable omission. Without acknowledging these factors, the true cultural implications of the proposed development remain misunderstood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as Indigenous People, yet the application lacks any process of Free, Prior and Informed Consent. This absence of genuine engagement calls into question the validity of the assessment and does not adhere to established principles of participation in matters that affect cultural and environmental interests.

A notable procedural failure is the lack of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic effects on the island community, thus obstructing a lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices clearly diverge from policy requirements.

Overall, the combined failure to consider living heritage, intangible cultural values, community rights, and statutory duties results in a substantial evidential gap. The application does not adequately assess the cultural impacts of the proposed development, leaving insufficient grounds for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The analysis of social impacts, health, and wellbeing associated with the proposal is fundamentally flawed and lacks the requisite transparency for a lawful assessment. Although the developer commissioned a Social Impact Assessment that included engagement with local residents through focus groups, the full report remains unpublished. This lack of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks highlighted by the developer's own research.

Summaries that are available reveal that local residents are currently facing notable levels of stress, anxiety, and concern linked to the proposal's scale and proximity. These effects stem from direct interactions and are therefore based on concrete evidence rather than speculation. The failure to make the complete assessment available undermines rigorous scrutiny of these findings and restricts the capacity to assess their relevance in the decision-making process.

Moreover, there is a notable perception that the proposal poses a direct threat to community identity and cohesion, with the developer's own findings acknowledging a

potential "cultural loss." Despite this, such impacts have not been sufficiently integrated into the main application nor afforded the appropriate consideration. The absence of the complete Social Impact Assessment thus conceals the actual human and social costs of the proposed development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and functionality are at risk. By withholding the complete dataset, the application fails to establish a comprehensive evidential foundation necessary for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not illustrate adherence to the National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; however, the evidence at hand suggests there are existing adverse effects that remain undisclosed. Without access to the full assessment, the demonstration of compliance with this policy is unattainable.

The procedural ramifications of this situation 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 represents a significant omission within the application and a failure to satisfy the evidential obligations of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Concerns also arise regarding the choice and presentation of visual viewpoints.

Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated, thereby compromising the assessment's reliability.

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

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the preservation of natural places and historic assets. The scale of change contradicts the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The absence of clearly defined mitigation measures and detailed management plans significantly undermines the assessment of construction and pollution risks. This proposal necessitates substantial seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The reliance on mitigation and contingency measures to be developed after consent raises serious concerns, as it hinders a meaningful evaluation of their adequacy and effectiveness.

Particularly troubling is the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application

acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring strategies.

There is significant uncertainty regarding the scale and behaviour of sediment plumes generated by 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 potential impacts. This uncertainty also extends to marine species and habitats that have been identified as sensitive within the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the critical point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated prior to consent; without such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with the requisite policies related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, inadequate management plans, and uncertainty surrounding potential impacts results in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are vital, not only for their diverse marine ecosystem but also for the active fishing industry that thrives there. However, the application in question fails to adequately assess the ecological and socio-economic impacts, raising profound concerns about the preservation of these critical resources. It is evident that the current evaluation does not sufficiently protect or maintain the existing habitats and uses of these waters, which is alarming.

A significant flaw within this proposal is the assumption that fishing activities can be relocated without any repercussions. The absence of evidence regarding the availability or suitability of alternative fishing grounds is particularly troubling. This oversight could lead to overfishing in other areas, potentially jeopardising the livelihoods of the local fishing fleet. Without a thorough and evidence-based examination, understanding the true impacts on fisheries and the communities that depend on them is impossible.

Moreover, the proposal presents considerable risks to marine species, especially due to the underwater noise generated during construction. The extended use of high-

energy hammer piling is predicted to disturb marine life across considerable distances, including species like dolphins. The potential disruption to a notable portion of the local bottlenose dolphin population is a serious concern, yet the application significantly downplays these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application, as it acknowledges the requirement for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction calls into question the reliability of the assessment and raises issues related to compliance with the Habitats Regulations, particularly when anticipated harm may require legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts of multiple factors, such as habitat disturbance, noise, and the displacement of fishing activities. Without an encompassing evaluation of these combined effects, one cannot ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show how the proposed development can coexist with current marine users or avoid detrimental impacts on marine biodiversity, making it impossible to conclude that this proposal aligns with sustainable development principles.

In conclusion, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies all contribute to an assessment that is incomplete and unreliable. Such deficiencies hinder any meaningful evaluation of the impacts on marine life and fisheries, leaving communities at risk.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application suffers from a fundamental lack of completeness in its assessment of onshore infrastructure, failing to address the full scope of impacts associated with what is essentially a singular integrated project. The offshore turbines and onshore works are inherently connected; however, they have been evaluated in isolation, leading to a fragmented understanding that conceals the true magnitude of both environmental and socio-economic consequences.

Onshore components include the installation of cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure that traverses sensitive landscapes. These activities necessitate excavation through areas of deep peat, especially within Barvas Moor, which is a critical carbon store and ecologically vulnerable habitat. The application lacks a thorough assessment of these impacts, thus obstructing a complete comprehension of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application hinders a

proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively. Nonetheless, the disjointed treatment of offshore and onshore components means that the combined effects on peatlands, ecosystems, and local communities remain inadequately understood.

Moreover, there are considerable risks to delicate habitats, including machair systems and peatland environments that are under policy protection. The application fails to demonstrate that the impacts on these critical habitats have been fully evaluated or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance due to potential disturbance of peatlands, which may release stored carbon and engender a carbon debt that contradicts the goals of renewable energy development. The application inadequately addresses this matter or illustrates that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land presents possible conflicts with existing land use and legal rights. The application does not furnish evidence that necessary consents or processes have been initiated, calling into question the feasibility and lawful execution of the project.

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

In summary, the disconnection of project components, the absence of a comprehensive evaluation, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that can be seen from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important due to the value of dark skies for the local identity and the growing tourism sector focused on astro-tourism. The lack of consideration for these impacts represents a clear gap in the overall assessment of the landscape and environment.

More importantly, there has been no evaluation of how nocturnal wildlife will be affected. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application fails to include any assessment of lighting impacts or a phototaxis study, and thus does not address how aviation lighting may affect these species or raise mortality rates.

This issue is exacerbated by the use of daytime survey data in the ornithological assessment, which does not account for nocturnal activity or related 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 absence of specific night-time data creates a significant gap in understanding the ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The required standard of evidence to rule out adverse effects beyond reasonable scientific doubt cannot be fulfilled, invoking the precautionary principle and hindering a lawful decision.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape impacts, as the night-time character is a vital part of the environment.

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

TOURISM

The application lacks a thorough assessment of tourism impacts, neglecting the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism heavily relies on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. Notably, 86% of visitors are attracted by the scenery, yet the application fails to provide a quantified evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and accounting for as much as 16% of the island's economy. However, the application does not model the potential impacts of seascape industrialisation and environmental quality loss on Tourism Gross Value Added or overall economic resilience. The lack of such an analysis leaves uncertainty regarding whether the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in enhancing tourism, including the value of unspoiled landscapes and dark skies for visitor experiences and the growing markets of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this oversight, creating a considerable gap in understanding the impacts on a recognised and developing segment of the local economy.

In a context where the island community has limited economic diversification, the neglect of tourism impacts carries broader implications for employment, local businesses, and community sustainability. Furthermore, the lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, evaluate environmental drivers of visitor behaviour, and consider the island's economic dependency culminates in a significant evidential gap. This deficiency hinders a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the essential requirements for sustainable development when evaluated against statutory obligations, national policy, and necessary evidential standards. This proposal mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It lacks complete and reliable baseline data, relies on an ambiguous design envelope, and depends on unspecified mitigation measures. Furthermore, it omits critical impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a significant 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.

The proposal directly contradicts National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage. It does not illustrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and preventing a lawful assertion that impacts are acceptable.

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 connections, and the effects on tourism create permanent impacts that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The volume of informational deficiencies, combined with policy contradictions and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or utilises the applicable regulatory provisions to demand the submission of the missing information.

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

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: 2BE0FFFB

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 thorough examination of the Environmental Impact Assessment Report and its accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. Concerns arise regarding the scale, proximity, and design of the project, questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for lawful determination. Essential environmental data is absent, baseline information is inconsistent and limited, and critical elements of the proposal remain unspecified. The flexible design framework used prevents a comprehensive understanding of potential significant effects, and the reliance on yet-to-be-defined mitigation measures raises doubts about their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects which are not backed by robust evidence.

There are evident and substantive conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests necessary for consent and compromise the capacity of the competent authority to affirm the proposal's acceptability in policy terms.

The unprecedented scale of the proposal introduces substantial concerns, especially with large turbines positioned near the shoreline, impacting landscape capacity, visual dominance, and overall environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear conflicts with policy indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a complete, transparent, or reliable evaluation of the proposal's likely environmental impacts. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the integrity of the assessment and makes it impossible to consistently apply a worst-case scenario, thus obscuring the true extent of environmental effects and hindering both public understanding and the competent authority's ability to make informed decisions.

Furthermore, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be addressed later obstructs any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This postponement of critical information until post-consent stages is procedurally unacceptable and contradicts the aim of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly identified before determination.

The application also suffers from considerable evidential shortcomings, including inadequate baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of the impacts, especially where negligible or non-significant effect conclusions lack robust supporting data. The deficiency of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is fundamentally flawed and does not fulfil the statutory requirements outlined by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application merely recounts the evolution of the project. This narrative fails to establish that less harmful

options have been adequately identified, assessed, and favoured over more damaging ones.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has meaningfully considered positioning the turbines further offshore, an option that would likely mitigate visual, ecological, and coastal impacts. The critical sensitivity of the West Lewis coastline and the significant role of proximity to shore in evaluating impacts make this omission particularly concerning, as it obscures any conclusion that the proposed siting is the least harmful option.

The inadequacies are evident in the cable routing and landfall assessment as well, where there is insufficient documentation indicating that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This includes regions of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy, coupled with the lack of comparative analysis, suggests that the approach taken has not incorporated mitigation by design, relying instead on measures intended for after the design phase.

As such, the application does not illustrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy and hampers the competent authority's ability to determine whether less harmful and more suitable alternatives exist. Without a comprehensive assessment of alternatives, it cannot be claimed that the proposal is sustainable or complies with policy guidelines.

From a policy standpoint, this inadequacy compromises alignment with National Planning Framework 4, especially concerning the safeguarding of natural environments, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant oversight that ultimately leads to the conclusion that the application has not been sufficiently evaluated and therefore cannot support a lawful determination.

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 conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, which are a European Protected Species. The application neglects to properly recognise and assess their active use of

coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction-related disturbance, noise, and increased activity have not been properly evaluated. As a result, the assessment's conclusions regarding the absence of significant effects on otters are undermined.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the actual presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological deficiencies mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the true 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 fails to properly identify or assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is fundamentally flawed, revealing significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. Situated on the west coast of the Isle of Lewis, an area known for its internationally important seabird populations, the proposed development fails to adequately demonstrate that these species, many of which are already in decline, will not face adverse effects. Critical foraging areas and migratory pathways are located within the development site, yet the assessment does not thoroughly evaluate the risks of displacement, collision, or habitat loss.

There exists a glaring contradiction in the application. While the developer asserts there will be no significant adverse effects, they simultaneously put forth a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious concerns about the assessment's

reliability, suggesting that the conclusions drawn are unsupported by the evidence provided. Furthermore, there is a lack of sufficient evidence to conclude that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment does not fully account for the critical importance of these feeding grounds, and the reliance on modelling methods creates uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. Methodological shortcomings may lead to an underestimation of mortality, especially in areas where baseline data is lacking and where the behavioural responses of species are not comprehensively understood.

The placement of turbines within a recognised migratory corridor introduces a substantial risk, acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of sustained mortality in this corridor and the potential impacts on species that possess relatively small global populations. From a regulatory standpoint, the application does not meet the evidential standards necessary to affirm no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means the standard of being beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, preventing a lawful conclusion that supports consent.

Moreover, the identified deficiencies represent a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and lack of robust evidence. As a result, it ultimately fails to meet the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community interact deeply. The application reduces heritage to static, isolated assets instead of acknowledging their ongoing social, cultural, and spiritual roles in the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites are active burial grounds and places of spiritual significance, yet the assessment labels them as mere static features, failing to account for their continued relevance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and ignores their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the community's long-standing bond

with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population has a unique cultural identity akin to that of Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process. The lack of genuine engagement calls into question the credibility of the assessment and fails to align with established participation principles in decisions affecting cultural and environmental matters.

There is a crucial procedural oversight regarding the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This lack of assessment alone obstructs a lawful decision.

From a policy standpoint, these shortcomings directly contradict the requirements of the National Planning Framework 4, particularly concerning the safeguarding of historical assets. The failure to account for both tangible and intangible heritage and to recognise ongoing cultural practices clearly deviates from established policy guidelines.

Overall, the neglect to evaluate living heritage, intangible cultural significance, community rights, and necessary statutory assessments results in a major evidential deficiency. The cultural effects of the development remain unexamined, and the application fails to provide an adequate foundation for determining the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available to the public. This lack of transparency creates a significant evidential gap, making it impossible for both the public and the competent authority to grasp the complete range of social risks identified by the developer's own research. The summaries that are accessible suggest that local residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts, arising from direct engagement, are not speculative. However, without the full assessment being disclosed, there is no opportunity for proper scrutiny, which in turn limits the capacity to assess the significance of these findings within the decision-making framework.

Moreover, there is a clear perception that the proposal threatens community identity and cohesion, with indications of "cultural loss" appearing in the developer's own findings. Nonetheless, these vital impacts have not been adequately incorporated into the main application nor given the necessary weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with

the development, undermining the overall Environmental Impact Assessment process.

A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when they may affect community character and functionality. The failure to provide the complete dataset means that the application does not furnish a comprehensive evidential basis to weigh the benefits against potential harms.

From a policy standpoint, this application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must promote positive health outcomes and avoid detrimental effects; however, the available evidence suggests existing adverse impacts that remain undisclosed. Without the full assessment, there is no way to confirm compliance with this policy.

The procedural ramifications of this situation are considerable. 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 requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This not only impedes a lawful determination but also reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be defined post-consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

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

be prevented, controlled, or monitored.

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

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

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

In summary, the absence of well-defined mitigation measures, inadequate management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of marine life and fisheries, failing to provide a comprehensive evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these habitats and uses can be safeguarded from disruption.

One major issue is the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds exist, are accessible, or can endure additional pressure. This absence of information is crucial, as such displacement could lead to overfishing in other areas and have broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential effects on fisheries and local livelihoods remain unclear.

The proposal also poses significant risks to marine species, particularly due to underwater noise from construction activities. Prolonged hammer piling may disturb

marine life over large areas, with the local bottlenose dolphin population expected to be significantly affected. The application downplays the seriousness of these impacts without adequate evidence, raising concerns about its reliability.

Moreover, there is a noticeable inconsistency within the application regarding the need for licences to harm European Protected Species, while simultaneously classifying these impacts as negligible. This contradiction questions the credibility of the assessment and highlights potential issues with compliance under the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

The assessment neglects to address cumulative impacts arising from various pressures, such as habitat disturbance, noise pollution, and fishing displacement. 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 viewpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity. Consequently, it cannot be concluded that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, underappreciation of acoustic impacts, and internal inconsistencies renders the assessment unreliable. These shortcomings obstruct 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 absence of an assessment concerning dark skies and nocturnal wildlife represents a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is distinguished by 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 considerable distances, threatens to create an intrusive and continuous "wall of light" across the western horizon, fundamentally changing the night-time environment.

Moreover, the proposal fails to evaluate the implications of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the critical role dark skies play in the identity of the region and the growing sector of astro-tourism, this lack of analysis is particularly concerning. The neglect to consider these impacts results in a distinct gap in the overall landscape and environmental assessment.

Equally alarming is the lack of any assessment regarding the impact on nocturnal

wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting due to their phototaxis behaviour, which can cause disorientation and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, thus neglecting to examine how the proposed aviation lighting could influence these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and the associated risks. Species such as Kittiwakes, which may forage or migrate during the night, also face disorientation from artificial lighting. The lack of site-specific night-time data hinders a comprehensive understanding of the ecological impacts involved.

Without a proper evaluation of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites may experience adverse effects. The required evidential standard necessary to exclude potential adverse impacts beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4 in its commitment to safeguarding natural spaces and maintaining environmental quality. Furthermore, it diminishes the broader evaluation of landscape and seascape effects, given that night-time character is an essential aspect of the environment.

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

TOURISM

The proposal lacks a thorough assessment of tourism impacts, resulting in a significant oversight regarding the economic and social implications for a vital sector of the Isle of Lewis economy. This area's tourism is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a sense of isolation. While it is noted that 86% of visitors are attracted by the scenery, the application does not provide a quantified analysis of how large-scale offshore developments may influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application fails to model how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the area. Without such critical analysis, it is impossible to ascertain whether the proposed development would offer a net economic advantage or potentially harm an already flourishing sector.

Moreover, the evaluation neglects to address the significance of environmental quality in attracting tourists, particularly the value of unspoiled scenery and dark skies to visitor experiences, as well as burgeoning markets such as nature-based and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the potential impacts on this acknowledged and expanding aspect of the local economy.

In an island community with limited economic diversification, the failure to evaluate the consequences on tourism carries broader implications for employment, local enterprises, and community sustainability. The omission of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been assessed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that highlight tourism as a priority growth sector, and fails to provide enough evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the inadequacy in quantifying tourism impacts, assessing the environmental factors that influence visitor behaviour, and acknowledging the island's economic dependencies culminates in a significant evidential shortfall. This hampers 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 fails to meet the requirements for sustainable development according to statutory duties, national policy, and evidential standards. The issues that caused the refusal of the Lewis Wind Power proposal in 2008 are repeated in this application. It presents a scale of industrialisation that is still deemed unacceptable, despite being submitted under a policy framework that places increased importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is an inadequate evidential basis for the application. Critical gaps in baseline data exist, and the design envelope remains undefined. Mitigation measures have not been specified, and key impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects have been omitted. The Environmental Impact Assessment is thus incomplete and does not facilitate a full understanding of likely significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, and the omission of a full Social Impact Assessment is a material deficiency. These failures hinder the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for

determination.

This proposal conflicts with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, or cultural heritage. There is insufficient evidence that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of net economic benefit. The cumulative impact of offshore and onshore elements has not been properly assessed, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

I came to this island in 1989, I live and work here, it's peaceful lifestyle it gives me and my family is second to none! The impact of all of those turbines will ruin the seascape, which in turn will be an impact on tourism, and the way the island is looked at. I understand we have to move with the times, but, ruining some peoples lifestyle to help others is not the way to do it!! I feel we've had no say in this at all, I hope this gets looked at in more detail, and the islanders who live and work here will be listened too.

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: 645D9272

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It is informed by a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. 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. The proposal raises serious concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application is deficient in providing an adequate evidential basis for a lawful determination. It lacks critical environmental data, presents limited and inconsistent baseline information, and leaves key aspects of the proposal undefined. The employment of a flexible design framework obscures understanding of potential significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive or informed assessment of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal presents clear and substantial conflicts with existing policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, undermining the ability of the competent authority to determine the acceptability of the development from a policy perspective.

The scale of the proposal is unprecedented for this area, with large turbines proposed in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy evaluation of the probable environmental repercussions of the proposal. By employing a flexible Project Design Envelope without any firm commitment to particular turbine dimensions, layouts, or configurations, significant uncertainty is introduced. This ambiguity undermines the integrity of the assessment and means that the impacts outlined may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true extent of environmental effects.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented is fundamentally unreliable, characterised by significant gaps in evidence and internal inconsistencies that severely undermine its conclusions.

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the proposed development, yet the assessment inadequately evaluates the risks of displacement, collision, or habitat loss.

Notably, there is a critical contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously putting forth a Habitats Regulations derogation case, which is only needed when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available.

Furthermore, the assessment does not adequately show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds has not been fully recognised, and reliance on modelling approaches introduces considerable uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given the incomplete baseline data and the insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor creates an additional and severe risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of sustained mortality in this corridor, nor does it consider the potential impacts on species with relatively small global populations.

Regulatory compliance is also in question; the application does not fulfil the evidential threshold required to conclude there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, means that the necessary standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Moreover, these identified deficiencies represent a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unaffected places the proposal in direct opposition to national policy.

In summary, the assessment is characterised by unreliability due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a thorough evaluation of potential impacts and culminate in the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is acknowledged as a living cultural landscape, where the interplay of environment, language, tradition, and community is essential. However, the application fails to recognise this interconnectedness, instead treating cultural heritage as a collection of static assets devoid of their dynamic social, cultural, and spiritual roles within the community. This reductive approach leads to a significant oversight regarding culturally significant sites, particularly the active burial and spiritual sites at Dalmore, Bragar, and Barvas. The assessment inaccurately categorises these places as static features, neglecting their continued use and the implications of development on their surroundings, which skews the evaluation of cultural effects and disregards their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment, is not addressed in the assessment. These vital elements contribute significantly to the area's identity, yet their absence represents a considerable oversight. The failure to incorporate these aspects limits the understanding of the true cultural impact of the proposed development.

Community rights and engagement are also central to this issue. The Gaelic-speaking population, characterised as an Indigenous People, has not been consulted in a manner that reflects the principles of Free, Prior and Informed Consent. This lack of meaningful engagement not only undermines the validity of the assessment but also fails to adhere to established practices in matters affecting cultural and environmental interests.

A critical procedural shortcoming is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, thus impeding lawful determination of the proposal.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, especially regarding the protection of historic assets and spaces. The disregard for both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from required policy standards.

In summary, the lack of assessment of 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 addressed, and the application fails to establish a sufficient basis for understanding the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This lack of access creates a substantial evidential gap, which hinders the public and the competent authority from fully grasping the range of social risks identified through the developer's own research.

Reports indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct engagement with the community and are not speculative in nature. The decision to withhold the full assessment restricts meaningful scrutiny of the findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these impacts have not been thoroughly incorporated into the main application nor given the appropriate weight they deserve. The absence of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This deficiency in transparency has implications for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a solid evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm. However, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This gap represents a significant omission in the application and signifies a failure to satisfy the evidential requirements dictated by the Environmental Impact Assessment regime.

In conclusion, the withholding of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment fails to adequately represent the magnitude of visual change resulting from the proposed large-scale turbines along the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The introduction of such turbines in close proximity to the shoreline would create a continuous industrial presence, fundamentally altering the coastal character and leading to a permanent transformation of the landscape.

The proposed development would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. Furthermore, there are significant methodological concerns regarding the selection and presentation of visual viewpoints. It appears that the viewpoints chosen may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of the visual impact, thereby undermining the assessment's reliability.

Additionally, the assessment neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape setting, interconnected visually and spatially with the Atlantic horizon. Treating these sites as isolated assets fails to recognise their interdependence and results in an incomplete evaluation of the impacts on their settings and cultural significance. The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been adequately addressed within the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which emphasises the importance of protecting natural places and historic assets. The scale of proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any claims of compliance with policy requirements.

Moreover, 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, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation efforts. Overall, the assessment does not accurately capture the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and strongly indicate that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail regarding construction and pollution risks, leaving the assessment incomplete and unable to adequately evaluate the likely environmental

effects. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet it does not present 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 has been granted, which hampers any meaningful assessment of their effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential accidental chemical or oil spills, it falls short of providing enough detail on how these incidents will be prevented, controlled, or monitored.

Uncertainty also surrounds the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty extends to potential effects on marine species and habitats that have already been recognised as sensitive within the wider assessment.

Moreover, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application restricts the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority 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 necessary mitigations must be evaluated prior to consent, and the lack of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks and further reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding marine species and habitats along the West Lewis coast, a region that not only boasts a diverse marine ecosystem but also supports an active fishing industry. The assessment provided is inadequate, lacking a robust evaluation of both ecological and socio-economic impacts. It neglects

to demonstrate how these vital uses and habitats can be protected without substantial disruption.

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

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

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

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

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

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

TOURISM

The Isle of Lewis relies heavily on tourism, with the sector growing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16%

of the local economy. However, the application fails to assess the significant economic and social impacts that the proposed development could have on this key sector. It is acknowledged that 86% of visitors are attracted by the area's scenery, yet there is no quantitative analysis provided to understand how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment does not take into account the crucial role that environmental quality plays in supporting tourism. The importance of unspoiled landscapes and dark skies to visitor experiences is essential, particularly for growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable gap in understanding the impacts on this recognised and expanding part of the local economy.

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

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

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and acknowledge the island's economic dependency leads to a significant evidential gap. This deficiency prevents a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development when evaluated against statutory duties and national policy. The concerns raised are similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, while submitted under a more robust policy framework, still lacks necessary considerations for biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant shortcomings in the evidential basis for this proposal. It fails to provide reliable baseline data, relies on an undefined design envelope, and does not specify its mitigation measures. Critical pathways of impact, including effects on nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. This renders the Environmental Impact Assessment incomplete, hindering an understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment constitutes a serious omission. These failures hinder a proper assessment of impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal contradicts the National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural spaces, and cultural heritage. Additionally, 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 impacts of both offshore and onshore components have not been assessed appropriately, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals raise concerns. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is 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 refuse consent or require the submission of the missing information.

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

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: 8AD4D5CD

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

Dear Sir/Madam

This objection is formally lodged against the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development's location off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity, raises significant issues. The scale, proximity, and design of the proposal present fundamental concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

An adequate evidential basis for a lawful determination is lacking, as critical environmental data is missing and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined. The flexible design framework utilised prevents a clear understanding of likely significant effects, and without specified mitigation measures, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantive policy conflicts are evident, as the proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly 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 affect the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

Unprecedented in scale for this location, the proposal features large turbines positioned close to the shoreline, leading to serious concerns about landscape capacity, visual dominance, and environmental impact. Collectively, 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 light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or dependable evaluation of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific dimensions, layouts, or

configurations of turbines, generates substantial uncertainty. This ambiguity undermines the assessment's integrity and inhibits a consistent application of a worst-case scenario, ultimately preventing both the public and the competent authority from grasping the full extent of environmental effects that may arise from the development.

Moreover, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be mitigated at a later stage obstructs any meaningful evaluation of the effectiveness of those measures or the assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation strategies must be clearly established prior to determination.

Additionally, significant evidential gaps exist, including deficiencies in baseline data and methodological limitations, as well as reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential standards mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, which includes mandates for biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In conclusion, the combination of reliance on an undefined design envelope, absence of clearly articulated mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of project evolution that does not adequately demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging solutions.

There is a clear absence of transparent comparison regarding alternative offshore sites,

development scales, and design configurations. The application notably does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely diminish. The West Lewis coastline's sensitivity and the importance of proximity to shore in assessing impact render this lack of analysis particularly concerning, as it prevents any conclusions that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where the evidence provided is insufficient to suggest that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors. This includes significant cultural and spiritual sites like Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been considered, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency raises serious concerns regarding adherence to National Planning Framework 4, especially in terms of protecting natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. Unfortunately, the ornithological assessment accompanying the application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to adequately demonstrate that these vulnerable species will not be adversely affected, particularly in light of the risks associated with displacement, collision, and habitat loss.

A fundamental contradiction exists within the application itself, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that the conclusions drawn are not backed by the underlying evidence. Furthermore, the assessment lacks sufficient evidence to assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected.

The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the inadequate understanding of the

behavioural responses of these birds. The siting of turbines within a recognised migratory corridor introduces a considerable risk by creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term implications of sustained mortality within this corridor, nor does it consider the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, paired with data gaps and limitations of the modelling approaches, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle and prevents a lawful conclusion in favour of consent.

Moreover, the identified deficiencies demonstrate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to convincingly show that internationally important seabird populations will not be adversely affected directly conflicts with national policy. Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and lack of robust evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely flawed, particularly in its treatment of the West Lewis coastline, which should be viewed as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising these elements, the application adopts a simplified perspective, treating cultural heritage as a collection of isolated, static assets. This approach neglects the active social, cultural, and spiritual roles these sites play within the community.

Significant deficiencies arise in the assessment of culturally important sites, notably the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice. However, they are mischaracterised as static features, with the assessment failing to account for their ongoing use and significance, as well as the potential impacts of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural consequences and ignores their integral role in community life.

The assessment also neglects intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment. These elements are vital to the area's identity yet are omitted from the assessment, creating a considerable oversight. Without acknowledging these aspects, it is impossible to truly grasp the cultural implications of the proposed development.

Concerns regarding community rights and engagement are also apparent. The Gaelic-speaking population has a unique cultural identity recognised as characteristic of an Indigenous People. However, the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement undermines the credibility of the assessment and disregards established principles regarding participation in decisions that affect cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure. This assessment is mandated under the Islands (Scotland) Act 2018, and without it, the competent authority is unable to meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone makes it impossible to proceed lawfully with the proposal.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The failure to adequately address both tangible and intangible heritage, alongside the need to acknowledge living cultural practices, represents a clear deviation from policy standards.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and as a result, the application falls short of providing a sufficient basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment raises serious concerns regarding its adequacy and legality. Although the developer engaged local residents through focus groups, the comprehensive report remains unpublished, creating a significant evidential gap. This omission obstructs the public and the competent authority from grasping the full scope of social risks highlighted by the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts stem from actual engagement rather than speculation. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, thereby hindering the determination of their relevance within the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own investigations. Yet, these social impacts have not been adequately addressed in the main application, nor have they been afforded the necessary

consideration. The withholding of the entire Social Impact Assessment conceals the genuine human and social cost associated with the development.

This situation critically undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality are potentially affected. By failing to disclose the complete dataset, the application lacks a comprehensive evidential foundation for weighing benefits against harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid negative impacts, yet the available evidence indicates existing adverse effects that have not been transparently reported. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a critical omission within the application and demonstrates a failure to meet the evidential standards of the Environmental Impact Assessment framework.

Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological issues also arise concerning how visual viewpoints have been selected and presented. It appears that these viewpoints do not fully reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and

valued landscapes. This oversight raises the possibility that the visual impact has been underestimated, thereby reducing the reliability of the assessment.

Moreover, there is a notable failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked visually and spatially to the Atlantic horizon. The assessment treats these as isolated features rather than recognising their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and diminishing their relationship with the natural horizon. This represents not only a visual effect but also broader cultural and spatial harm that the application has not adequately addressed.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks comprehensive detail regarding construction and pollution risks, failing to allow for a proper evaluation of potential environmental effects. It entails significant seabed preparation and installation works in a challenging Atlantic environment, yet fully developed Construction Environmental Management Plans and Pollution Prevention Plans are absent. Instead, the application depends on mitigation and contingency measures that are intended to be developed after consent has been granted, which hampers any meaningful assessment of their adequacy and effectiveness.

This dependence on undefined future measures raises serious concerns, particularly given the vulnerability of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that could be harmed by sediment disturbance and contamination. Although the application identifies risks such as sediment mobilisation and potential chemical or oil spills, it fails to present adequate

information on how these risks will be prevented, managed, or monitored.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from the disturbance of the seabed and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are established to address pollution incidents. This introduces procedural risks and undermines the capacity of the competent authority to appraise environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation measures be assessed prior to granting consent, and the absence of such information renders a lawful determination impossible. The application also fails to showcase adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries related to the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The coastal waters off West Lewis are home to a vibrant marine ecosystem and an active fishing industry. However, the proposal does not adequately address how these vital uses and habitats will be preserved or sustained without substantial disruption.

A critical concern lies in the flawed assumption that fishing activities can be relocated without significant repercussions. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure that displacement would entail. This gap in information is crucial, as it poses risks of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. In the absence of a clear, evidence-based assessment, understanding the implications for fisheries and local livelihoods remains impossible.

Furthermore, the proposal poses considerable risks to marine species, primarily due to the underwater noise produced during construction. The use of high-energy hammer

piling over an extended duration is expected to create disturbances across considerable distances, negatively impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is particularly alarming. Yet, the application minimises these potential effects and does not provide adequate 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 recognised, while simultaneously describing the impacts as negligible. This contradiction calls into question the validity of the assessment and raises issues concerning adherence to the Habitats Regulations, especially when harm is expected to a level that would require legal clearance.

Additionally, the assessment neglects to address the cumulative impacts that arise 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 consequences for marine ecosystems and socio-economic conditions.

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

In summary, the shortcomings related to evidence on fishing displacement, the minimisation of acoustic impacts, and the inconsistencies within the application render the assessment both incomplete and unreliable. These inadequacies impede a thorough understanding of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is significantly lacking, failing to encompass the full range of impacts from what constitutes a single integrated project. The linkage between the offshore turbines and the onshore works is crucial, yet they are assessed independently, leading to a disjointed analysis that obscures the true magnitude of environmental and socio-economic consequences.

Onshore works entail cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through delicate landscapes. These operations involve excavation in areas of deep peat, particularly within Barvas Moor, which is an essential carbon store and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, which hampers a complete understanding of the project's overall environmental footprint.

The failure to adequately assess the onshore impacts restricts the proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all

project components must be considered collectively; however, the distinct treatment of offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities, preventing a full understanding of the ramifications.

Moreover, there are serious concerns regarding the risk to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not provide assurances that impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented, thereby creating a significant evidential gap in the context of biodiversity protection.

The proposal also raises alarm about carbon balance, as the disruption of peatland can release stored carbon, potentially generating a carbon debt that contradicts the goals of renewable energy development. The application fails to properly address this critical issue or to show that the overall carbon balance remains advantageous.

In addition, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The lack of evidence indicating that necessary consents or processes have been initiated raises serious concerns regarding the feasibility and lawful implementation of the project.

From a policy standpoint, the failure to assess the project as a unified whole, alongside the lack of demonstration that peatlands, habitats, and land use interests are protected, directly contradicts the principles outlined in the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be effectively avoided or mitigated further undermines the integrity of the application.

Overall, the segregation of project components, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. The Environmental Impact Assessment fails to address the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Such an omission is particularly concerning given the significance of dark skies to the area's identity and the burgeoning tourism sector focused on astro-tourism.

Moreover, there is no evaluation of the impact on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, potentially facing disorientation and an increased risk of collision. The application does not include any lighting impact

assessment or phototaxis study, failing to evaluate how aviation lighting might influence these species or lead to increased mortality rates.

The shortcomings are exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Other species, like Kittiwakes, which may forage or migrate at night, are similarly at risk of disorientation from artificial lighting, yet this hazard has not been examined. The absence of site-specific night-time data leads to a critical gap in understanding the ecological impacts.

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

From a policy standpoint, the lack of assessment contradicts the National Planning Framework 4, which seeks to protect natural places and uphold environmental quality. Additionally, it weakens the overall evaluation of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

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

TOURISM

The assessment regarding tourism impacts is significantly lacking and does not address the economic and social repercussions for a crucial part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. The application itself notes that 86% of visitors are attracted by the scenery, yet it fails to provide any measurable analysis on how extensive offshore infrastructure could influence visitor numbers, behaviours, or their overall economic contributions.

The tourism sector has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and degradation of environmental quality might affect Tourism Gross Value Added or the overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic advantage or harm an established and expanding sector.

Moreover, the assessment neglects the significance of environmental quality in fostering tourism, including the critical role of pristine landscapes and dark skies in shaping visitor experiences and capitalising on new markets like nature-based tourism

and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

Given that the island community has limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment, local enterprises, and community sustainability. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been appraised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to prove adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefits. It also contradicts strategic objectives that highlight tourism as a key growth sector, and does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Altogether, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and recognise the island's economic dependence leads to a significant evidential gap. This undermines a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal significantly fails to meet the requirements for sustainable development, as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues identified in the previous 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current proposal is being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential foundation necessary for determination. The application lacks comprehensive baseline data, relies on an undefined design envelope, depends on unspecified mitigation measures, and fails to address essential impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Moreover, clear procedural lapses are present. The lack of a compliant Island Communities Impact Assessment violates the statutory requirements outlined in the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment constitutes 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 unsuitable for determination.

This proposal directly contradicts the principles established in National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. The application fails to show acceptable health and wellbeing impacts and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain ambiguous and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in several areas. The evidential threshold to conclusively exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In light of these considerations, the application is fundamentally unfit for determination both procedurally and substantively. The multitude of informational deficiencies, policy inconsistencies, and unresolved environmental risks prevent a lawful and evidence-based decision. Therefore, the competent authority must refuse consent based on these grounds or invoke the relevant regulatory measures to obtain the necessary missing information.

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

Additional Comments

I am frankly horrified by this 'development'. I'm an islander of many generations, all of them proud Gaels who value this beautiful land. The destructive nature of what's proposed is irreversible and will affect generations to come. I don't understand the drive to increase tourism while at the same time tearing our peace and beauty apart. We have a unique landscape and culture which is being sacrificed for the sake of multinational corporations and profit. I wholeheartedly object to this and other related developments.

As a concerned former GP, the health of the population of these beautiful islands is paramount to me. I believe that this development potentially poses a public health risk, particularly in relation to the onshore infrastructure's hidden impacts. I previously objected to onshore developments by writing the following;

To my knowledge, no scientifically based air-quality assessment has been undertaken to quantify the impacts of fine particulate matter ($PM_{2.5}/PM_{10}$) from exposed peat or diesel emissions. Without this, the proposal fails the precautionary principle under the Environmental Principles (Scotland) Act 2021. To put it bluntly, air pollution from dried peat dust which is an inevitable by product of this development may contribute to islanders experiencing increased rates of heart attacks and angina, strokes, cancers and chronic lung conditions. In addition, there is likely to be an increased risk from released radioisotope particles from its peat storage sites.

To quote from the World Health Organisation;

'The burden of disease attributable to air pollution is now estimated to be on a par with other major global health risks such as unhealthy diets and tobacco smoking. In 2015, the World Health Assembly adopted a landmark resolution on air quality and health, recognizing air pollution as a risk factor for noncommunicable diseases such as ischaemic heart disease, stroke, chronic obstructive pulmonary disease, asthma and cancer, and the economic toll they take.'

1. Environmental Impact

● **Damage to Peatlands:** The site is on carbon-rich peatland, a critical global carbon sink.

Excavation, construction, and associated infrastructure (wind farms, pylons, substations) will lead to carbon release, undermining national and international climate targets.

● **Disruption to Wildlife Habitat:** The area is home to Red List bird species and other protected wildlife. Industrial-scale development, along with noise and artificial lighting, will have a significant detrimental impact.

2. Impact on Amenity

● **Noise & Light Pollution:** A converter station of this size will generate a continuous low-frequency hum and require 24-hour lighting, affecting the tranquillity of the surrounding area.

● **Visual Impact:** The proposed structure is industrial in nature, out of character with its rural setting, and will be highly visible from multiple viewpoints.

3. Infrastructure & Road Safety Concerns

● **Traffic & Safety Issues:** The construction phase will bring heavy vehicle traffic to roads not designed for such loads, increasing safety risks.

● **Strain on Local Services:** Emergency services, drainage, and waste management systems may struggle to cope with the demands of this facility.

4. Planning Policy & ‘Salami Slicing’ of Development

● **Inadequate Consideration of Cumulative Impact:** The converter station covers 285 hectares, an area equivalent to Stornoway or 399 football pitches. It is part of a larger industrialisation effort, including the 33-turbine Stornoway Wind Farm (EDF/ESB), and other proposed wind farms (e.g., N3 Talisk and N4 Spiorad na Mara), all of which are seeking onshore substations nearby.

● **Failure to Conduct a Comprehensive Environmental Impact Assessment (EIA):** The fragmented approval process fails to assess the full impact of multiple interconnected projects. A comprehensive EIA must be undertaken before any decision is made.

The development threatens peatland integrity, protected wildlife, and local infrastructure while bypassing the necessary cumulative impact assessments.

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: 41A9F331

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 an examination of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural heritage. The proposal's scale, proximity to the shore, and design prompt serious concerns regarding its alignment with statutory obligations, national policy, and sustainable development principles.

The application lacks an adequate evidential foundation for a lawful decision. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and several key elements of the proposal remain unclear. The proposal's flexible design framework hinders a thorough understanding of potential significant effects, while the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the existing documentation does not facilitate a comprehensive or informed appraisal of the environmental, cultural, or community impacts, nor do the assertions of negligible or non-significant effects rest on solid evidence.

Substantial conflicts with policy are evident. The proposal seems to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately show that national standards for protecting biodiversity, climate considerations, and environmental integrity can be achieved. These discrepancies undermine the statutory tests essential 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 at this site, with large turbines planned near the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, it is necessary to apply the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks comprehensiveness and fails to deliver a transparent and reliable analysis of the potential environmental consequences of the proposed development. By employing a flexible Project Design Envelope that lacks concrete commitments to specific turbine dimensions, layouts, or configurations, the report introduces considerable uncertainty. This approach obstructs the consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. Consequently, the impacts indicated may not accurately represent the actual development that will be constructed, which in turn hinders both public understanding and the competent authority's capacity to grasp the full extent of environmental implications.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any thorough evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable, as it contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established prior to determination.

The application also exhibits significant evidential gaps, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thus introducing scientific uncertainties that are incompatible with statutory obligations.

As a result, the application does not fulfil the evidential standards required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, specifically its requirements for biodiversity protection and environmental integrity, as it has not been proven that impacts have been comprehensively assessed or that appropriate safeguards exist.

In summary, the combination of an undefined design envelope, the absence of specific mitigation strategies, and existing gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and thorough evaluation of environmental effects, thereby leaving the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed development suffers from a materially inadequate assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact

Assessment regime. Instead of delivering a structured and reasoned comparison of realistic alternatives based on environmental effects, the application offers a narrative of the project's evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a distinct lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not indicate that the developer has genuinely explored the possibility of placing turbines further offshore, where the potential for reduced visual, ecological, and coastal impacts would exist. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in determining impact, the absence of such analysis precludes any assertion that the proposed siting is the least damaging option available.

The inadequacies further extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis point to a failure to apply mitigation by design, resulting in a reliance on post-design mitigation measures instead.

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

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One major concern is the omission regarding otters, a European Protected Species. The application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. This oversight extends to the core foraging range and

behavioural patterns of otters, which have not been sufficiently evaluated in terms of the potential impacts arising from construction disturbances, noise, and increased human activity. Consequently, any conclusions drawn about the absence of significant effects on this species are fundamentally flawed.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a significant risk due to the siting of turbines within a recognised migratory corridor, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. There is inadequate assessment of the long-term implications of sustained mortality within this corridor, as well as insufficient evaluation of the potential effects on species with relatively small global populations.

Moreover, the ornithological assessment reveals substantial flaws, including significant gaps in evidence and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected to the requisite evidential standard. It fails to robustly evaluate the implications of displacement, collision risk, or

habitat loss, particularly concerning seabirds associated with protected sites like the Lewis Peatlands and St Kilda.

A fundamental contradiction exists within the application, as the developer asserts no significant adverse effects while also advancing a Habitats Regulations derogation case. Such a case is only necessary when significant harm is expected, thus raising serious questions about the reliability of the assessment. The reliance on modelling approaches introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars, and the methodologies used are likely to underestimate mortality where baseline data is incomplete and behavioural responses are not fully 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, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, which hinders a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies indicate a failure to comply with National Planning Framework 4 regarding biodiversity protection and safeguarding natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these shortcomings render the assessment unreliable, preventing a robust evaluation of impacts and leading to the conclusion 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 associated with the proposed development is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interconnected. The evaluation adopts a narrow perspective, viewing heritage merely as isolated, static assets without acknowledging their ongoing social, cultural, and spiritual significance within the community.

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

Moreover, the assessment does not take into account intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are

vital to the area's identity and are conspicuously missing from the assessment, constituting a major oversight. The failure to consider these factors inhibits a comprehensive understanding of the development's cultural impact.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment significantly hampers the evaluation of social, health, and wellbeing impacts related to the development proposal. While the developer engaged with local residents through focus groups, the absence of the full report creates a notable evidential gap. This omission hinders both public understanding and the competent authority's ability to grasp the full range of social risks identified by the developer's own research.

Residents have already reported experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement with the community and are not mere speculation. However, the failure to release the complete assessment limits proper scrutiny and impedes the ability to assess the significance of these findings within the decision-making framework.

Moreover, the proposal is perceived as a threat to community identity and cohesion, with findings highlighting potential "cultural loss." Yet, these important social impacts have not been adequately integrated into the main application or given the necessary

consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application does not offer a robust evidential basis to assess the balance between benefits and potential harm.

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

The procedural consequences of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which constitutes a material omission in the application and fails to meet the evidential standards required by the Environmental Impact Assessment regime.

In conclusion, the failure to disclose the full Social Impact Assessment, along with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the notion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed turbines is significantly inadequate, failing to accurately capture the scale of change and the sensitivity of the West Lewis coastline. This area is characterised by its unspoilt Atlantic horizon, natural landscape, and a profound sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a pervasive industrial presence that would fundamentally change this character, leading to an irreversible transformation of the landscape.

The application does not effectively represent the extent of the visual changes anticipated. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts in the context of such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios,

particularly regarding cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, disregarding their interdependence, which results in a partial evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these important relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This not only represents a visual issue but also inflicts broader cultural and spatial damage, which has not been sufficiently evaluated in the application.

From a policy standpoint, this proposal contravenes the National Planning Framework 4, particularly regarding the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further diminishes any claims of compliance with policy guidelines.

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly indicate that the proposal is incompatible with the necessary protections for this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment provided regarding construction and pollution risks is notably deficient, lacking the essential detail needed to properly evaluate potential environmental impacts. The project entails significant seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that will only be developed after consent, which hampers any meaningful assessment of their adequacy or effectiveness.

The reliance on these vague future measures raises serious concerns, particularly due

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

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

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

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

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

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, lacking a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast support a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate how these important uses and habitats can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be relocated without negative consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can handle additional pressure. This lack of information is critical, as displacing fishing efforts could lead to overfishing in other areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods

remain unclear.

The proposal also poses considerable risks to marine species, especially due to underwater noise produced during construction activities. The high-energy hammer piling planned for an extended duration is expected to disturb marine life over large distances, notably affecting species like dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

There is a clear contradiction in the application where it acknowledges the need for licences to harm European Protected Species while simultaneously describing those impacts as negligible. This inconsistency undermines the validity of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorization.

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

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

In summary, the assessment is incomplete and unreliable due to the lack of evidence regarding fishing displacement, underestimation of acoustic impacts, and internal contradictions. These shortcomings hinder a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, as it fails to adequately evaluate the onshore infrastructure and its impacts as part of a unified project. The offshore turbines and the associated onshore works are inextricably linked, yet they have been assessed separately, leading to a disjointed evaluation that obscures the true extent of the environmental and socio-economic implications.

The onshore components comprise cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities will involve excavation in areas of deep peat, particularly within Barvas Moor, which is both an important carbon store and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore effects, the application impedes the proper consideration of cumulative impacts. The Environmental Impact Assessment process stipulates that all parts of a project should be reviewed collectively. However, the distinction between offshore and onshore elements has resulted in a failure to fully comprehend the combined effects on peatlands, local habitats, and surrounding communities.

Moreover, there are substantial risks to sensitive ecosystems, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, leading to a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance also emerge from this proposal. The disturbance of peatland can release stored carbon, potentially incurring a carbon debt that counters the aims of renewable energy initiatives. The application does not convincingly address this concern or show that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land presents possible conflicts with current land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, which raises issues about the project's viability and lawful execution.

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

In conclusion, the fragmented approach to the assessment of project components, the absence of a comprehensive evaluation, and the lack of evidential support concerning environmental and land use impacts render this portion of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting will be visible over long distances and creates a continuous intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially important given the role of dark skies in the area's identity and the potential for growth in tourism

sectors such as astro-tourism. The omission of these impacts results in a notable shortfall in the overall landscape and environmental assessment.

Additionally, there is a complete absence of evaluation regarding the impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and higher collision risks. The application lacks any lighting impact assessment or study of phototaxis, failing to consider how the proposed aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activities or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this concern has not been addressed. The absence of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it becomes impossible to determine whether protected species or designated sites could be adversely affected. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the protection of natural areas and environmental quality. Furthermore, it undermines the overall assessment of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

In summary, the lack of any 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 unable to support a lawful determination.

TOURISM

The economic contribution of tourism to the Isle of Lewis is significant, having grown from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, which accounts for up to 16% of the island's economy. However, the application in question fails to adequately evaluate the tourism impacts, neglecting to assess the economic and social consequences for this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's scenery, there is no quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment overlooks the crucial role of environmental quality in sustaining tourism, particularly the appeal of unspoiled landscapes and dark skies to

the visitor experience. This gap is further exacerbated by the absence of a Dark Skies Assessment, which is essential for understanding the implications for nature-based tourism and astro-tourism, both of which are emerging markets for the area.

In an island community with limited economic diversification, the neglect to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities, as mandated by the Islands (Scotland) Act 2018, have not been properly evaluated.

Moreover, 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 prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency culminate in a substantial evidential gap. This lack of thorough analysis inhibits a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. Notably, this new application is presented within a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

A thorough evidential basis for the determination of the application is lacking, with significant gaps in baseline data. 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, onshore infrastructure, and tourism—further contribute to an incomplete Environmental Impact Assessment. Consequently, this incompleteness hinders a full understanding of likely significant effects and residual impacts.

Moreover, procedural failures are apparent in this application. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose a complete Social Impact Assessment is a material omission. These shortcomings impede the competent authority's ability to assess the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent within themselves. The necessary evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

In summary, the application is unfit for determination both procedurally and substantively. The significant information deficiencies, along with conflicts with policy 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 require the submission of the missing information.

In light of these points, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

Our ancient land is but a small dot on this vast planet. The impact of this destructive plan is disproportionate to the size of our Island.

* The turbines are too large. Their visual image and impact is overbearing.

* The years of construction alone will totally alter the strength and safety of our meagre roads, some only pathways leading to higher rates of accidents and roads left for years if not decades unsafe because the Council will not have the money to constantly repair them. We have this problem already on roads around the Isle left in a poor state of repair due to no funding.

* The damage to our unique scenery cannot be measured until it is too late. We have a strong Heritage culture that will never ever recover from the abuse the Isle will suffer.

From Contruction, to Maintenance and to the devastation left behind when the Turbines are de-commisioned.

* Tourism is vital for our fragile communities. "National Geographic" has named the Outer Hebrides as one of their 'Best of World' destinations for 2025.

The light polution alone will drastically impact on our Dark Skies and visitors coming solely for the The Northern Lights.

* The Mental Health of our people will suffer. It is already with the worry and stress of what might happen. This cannot be played down with rhetoric about the artfully worded promises of financial stability and work for local people. There is noise and light pollution. Pollution to our peatlands - peat is a vital carbon store, lochs, local water, seabed destruction Our Marine eco-system will suffer.

* The Council cannot give their permission for this plan to go ahead. Long after we have all died - and new families have stopped coming to live on the Island - who knows how the Spirit of the Sea will still be harming those who come after us.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 23AF010C

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 presents numerous deficiencies that render it unreliable and incomplete. It heavily relies on undefined mitigation measures,

monitoring strategies, and management plans that have not yet been articulated. This approach seeks consent based on the premise that environmental harms will be managed in the future, thus obstructing any meaningful evaluation of the effectiveness of these measures or a proper assessment of residual impacts. Deferring critical information to the post-consent stage is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment regime, which mandates the clear establishment of significant effects and their mitigation before any determination is made.

Additionally, there are considerable gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, especially when claims of negligible or non-significant effects are not backed by robust data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty incompatible with statutory obligations.

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

The reliance on a flexible Project Design Envelope, devoid of specific turbine dimensions, layouts, or configurations, fosters significant uncertainty that hinders a consistent application of a worst-case scenario. Such a lack of commitment undermines the integrity of the assessment, meaning that the impacts presented may not truly represent the development ultimately constructed. Consequently, the competent authority and the public are left without a clear understanding of the actual environmental effects, which further complicates the decision-making process.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough and structured evaluation of alternatives, which is crucial under the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives based on their environmental impacts, it provides an incomplete narrative of the project's development. This narrative does not satisfactorily prove that less harmful options have been properly identified and assessed in preference to more damaging choices.

Moreover, there is a notable absence of transparent, evidence-based comparisons of alternative offshore sites, development scales, or design configurations. Specifically, the failure to demonstrate that the developer has seriously contemplated placing turbines further offshore, where potential visual, ecological, and coastal impacts may be reduced, is concerning. The sensitivity of the West Lewis coastline, along with the critical nature of proximity to shore in assessing impact, underscores the importance of

this analysis. Without it, one cannot confidently assert that the proposed siting is the least damaging option available.

This inadequacy extends to the evaluation of cable routing and landfall, where the application does not provide sufficient evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been considered, with a reliance instead on post-design mitigation strategies.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight indicates a failure to adhere to the established mitigation hierarchy, preventing the competent authority from ascertaining the existence of less harmful and more suitable alternatives. In the absence of a robust assessment of alternatives, one cannot conclude that the proposal is a sustainable or policy-compliant solution.

From a policy perspective, these shortcomings compromise adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment constitutes a significant omission, further reinforcing the conclusion that the application has not been sufficiently evaluated to support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, viewing heritage merely as a series of isolated, static assets, without recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as 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 acknowledge the impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards the vital role these sites play in community life.

Furthermore, the application overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, representing a significant omission. Without factoring in these aspects, the cultural impact of the development cannot be understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristic of Indigenous Peoples, yet no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy standpoint, the deficiencies outlined 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, alongside the recognition of living cultural practices, signifies a clear departure from policy requirements.

In summary, the lack of assessment regarding 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 adequately assessed, and the application does not offer a sufficient basis for evaluating the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

TOURISM

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

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

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

Given the limited economic diversification within the island community, the neglect to assess tourism impacts carries broader ramifications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately evaluated as stipulated by the Islands (Scotland) Act 2018.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious failure to meet the principles of sustainable development as required by statutory duties and national policy. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which was rejected due to its unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains inadequate.

Significant gaps exist in the evidential foundation necessary for proper determination. The use of an undefined design envelope is problematic, and there is a reliance on unspecified mitigation measures. Notably, the application overlooks critical impact pathways, including those affecting nocturnal wildlife, the complete scope of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment falls short, hindering a comprehensive understanding of likely significant effects and residual impacts.

Moreover, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the absence of a full Social Impact Assessment is a material omission. These shortcomings inhibit the

competent authority from fully evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal also directly contradicts National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable nor does it establish a net economic benefit, as it lacks tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination regarding acceptable impacts.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B9939FF9

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage.

The documentation provided fails to offer adequate evidence for a lawful decision. There are critical gaps in environmental data, while the baseline information presented is limited and inconsistent. Essential components of the proposal remain undefined. The flexible design framework complicates the understanding of possible significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the information does not allow for a thorough understanding of the impacts on the environment, culture, or community, and claims regarding negligible or non-significant effects lack robust support.

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, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and impair the competent authority's ability to conclude the development is acceptable under policy guidelines.

The scale of this proposal is unprecedented for the area, with large turbines planned to be positioned close to the shoreline, raising significant issues around landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, 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 should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and lacks a full, transparent, and reliable account of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to specific turbine dimensions, layouts, or configurations, introduces

substantial uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts presented may not accurately reflect the actual development constructed, which obstructs both the public and the competent authority from comprehending the true extent of the environmental effects.

Furthermore, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consent is thus being sought with the understanding that any environmental harm will be addressed at a later stage, which precludes a meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and is contrary to the objectives of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation are clearly established prior to any determination.

There are also major evidential shortcomings, such as gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects and indicate that the competent authority is not equipped to determine the application based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presented in this application is fundamentally flawed, lacking a comprehensive understanding of the ecological receptors in the West Lewis coastal area. The region is characterised by a sensitive and biologically active marine environment, yet the baseline data provided is insufficient. The methodologies employed fail to adequately document species presence, behaviour, and habitat utilisation, which in turn affects the reliability of the

assessment's conclusions regarding potential impacts.

A significant oversight is noted in the treatment of otters, classified as a European Protected Species. The application does not appropriately recognise or assess their active foraging and movement within coastal zones. This lack of analysis concerning their core foraging areas and behaviour means that the implications of construction-related disturbances, including noise and increased activity, have not been thoroughly examined. Consequently, the assumptions made regarding the absence of significant effects on otters are undermined.

Further shortcomings emerge in the assessment concerning basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, leading to a likely underestimation of their presence in these waters. This approach contrasts unfavourably with established land-based observations that indicate a frequent occurrence of basking sharks. The omission of such data contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects that are based more on assumptions than on solid evidence. Moreover, the lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which encompass seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the necessary criteria set out by the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species have not been adequately conducted. The introduced uncertainty prevents the elimination of adverse effects beyond a reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these conditions, the granting of consent would be unlawful.

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

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

and spiritual relevance to the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment classifies them as unchanging features, failing to acknowledge their continued significance and the potential impact of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and overlooks their vital role in community life.

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

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity, with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's validity and fails to adhere to established principles for participation in decisions that impact cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing raises significant concerns regarding the adequacy of the evaluation process. Although the developer commissioned a Social Impact Assessment that included input from local residents through focus groups, the full report remains unpublished. This

creates a substantial evidential gap, inhibiting the public and the competent authority from comprehensively understanding the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct community engagement rather than speculative assumptions. Nonetheless, the non-disclosure of the complete assessment hampers thorough scrutiny of these findings and restricts the ability to assess their importance within the decision-making framework.

Furthermore, the proposal is viewed by many as a direct threat to community identity and cohesion, with findings indicating a risk of "cultural loss." Despite this, these social impacts have not been appropriately integrated into the primary application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The implications for the Environmental Impact Assessment process are serious. To fully understand the social, economic, and health impacts of developments of this magnitude, particularly those that may alter community character, access to the complete dataset is essential. The application does not provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm. However, the evidence that has been made available suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with relevant policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material failure in the application, undermining the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to warrant approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not adequately portray the sensitivity of the receiving environment or the scale of change involved. The coastline of West Lewis is characterised by an expansive Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The proposed

introduction of large-scale turbines situated close to the shoreline would establish a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

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

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

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

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

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

It is also evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting change is therefore fundamentally permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The assessment presented within the application lacks the necessary depth to evaluate the impacts on fisheries and marine life adequately. The waters off the West Lewis coast not only sustain a diverse marine ecosystem but also support an active fishing industry. However, the application fails to demonstrate that these habitats and uses can be preserved without substantial disruption.

A significant concern lies in the assumption made regarding the displacement of fishing activities. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can accommodate increased fishing pressure. This gap is critical, as the potential for overfishing in other areas poses risks to the local fishing fleet's economic stability. Without a rigorous evidence-based assessment, the consequences for fisheries and local livelihoods remain poorly understood.

The proposal introduces considerable risks to marine species, particularly due to underwater noise generated by construction activities. The use of high-energy hammer piling over an extended duration is expected to cause disturbances across vast areas, impacting species such as dolphins. Notably, the projected disturbance to a significant portion of the local bottlenose dolphin population raises alarm; however, the application diminishes the seriousness of these effects without adequate supporting evidence.

An inconsistency is evident in the application's acknowledgement of the need for licences to permit harm to European Protected Species, while simultaneously characterising impacts as negligible. This contradiction calls into question the credibility of the assessment and raises compliance concerns with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disruption, noise, and the displacement of fishing activities. The absence of a comprehensive analysis of these combined effects hampers the ability to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not substantiate its compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion regarding the proposal's sustainability.

In summary, the deficiencies in evidence relating to fishing displacement, the underestimation of acoustic impacts, and internal contradictions render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the effects on marine life and fisheries.

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 assessment regarding tourism impacts is significantly lacking and does not address the economic and social repercussions for a crucial part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. The application itself notes that 86% of visitors are attracted by the scenery, yet it fails to provide any measurable analysis on how extensive offshore infrastructure could influence visitor numbers, behaviours, or their overall economic contributions.

The tourism sector has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not evaluate how the industrialisation of the seascape and degradation of environmental quality might affect Tourism Gross Value Added or the overall economic resilience. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic advantage or harm an established and expanding sector.

Moreover, the assessment neglects the significance of environmental quality in fostering tourism, including the critical role of pristine landscapes and dark skies in shaping visitor experiences and capitalising on new markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impacts on a recognised and burgeoning segment of the local economy.

Given that the island community has limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment, local enterprises, and community sustainability. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been appraised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to prove adherence to the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefits. It also contradicts strategic objectives that highlight tourism as a key growth sector, and does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Altogether, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and recognise the island's economic dependence leads to a significant evidential gap. This undermines a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as mandated by statutory duties, national policy, and evidential requirements. This application brings forth the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was clearly highlighted. Now, it

is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the determination of this application is neither complete nor reliable. It suffers from critical gaps in baseline data, the use of an undefined design envelope, an over-reliance on unspecified mitigation measures, and a failure to address key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, leaving significant effects and residual impacts inadequately understood.

Moreover, there are notable procedural failures present. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, and the omission of a comprehensive Social Impact Assessment is a serious material shortcoming. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for a lawful determination.

In direct contradiction to National Planning Framework 4, the proposal fails to provide evidence of biodiversity protection, preservation of natural places, and safeguarding of cultural heritage. It does not substantiate 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 impacts of both offshore and onshore elements have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The evidential threshold necessary to confidently exclude adverse effects has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

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

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

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

Additional Comments

We don't need any more wind farms.

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: D75CFEF0

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's scale, proximity to the shoreline, and design, all of which question its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. There is a critical absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Several key aspects of the proposal are undefined, and the flexible design framework used hinders a comprehensive understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a complete and informed overview of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack solid evidence.

The proposal faces clear and substantial policy conflicts. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's capacity to deem the development acceptable from a policy standpoint.

Given the unprecedented scale of the proposal in this location, with large turbines situated close to the shoreline, there are significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability needed to fully account for the potential environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, results in considerable uncertainty. This uncertainty compromises the integrity of the assessment, meaning that the impacts detailed may not accurately represent the development that will ultimately be constructed. As a result, both the public and the competent authority are unable to grasp the true extent of the environmental effects.

The application relies on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the understanding that environmental harm will be addressed later prevents a proper evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to stages after consent is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before a determination is made.

Moreover, there are considerable evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions in lieu of site-specific evidence. Such issues result in uncertainty surrounding 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, leading to scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal also fails to comply with the National Planning Framework 4, especially in terms of biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been fully assessed or that proper safeguards are established.

In summary, the dependence 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 hinder a lawful and robust evaluation of environmental effects, preventing the competent authority from making a well-informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to its materially inadequate assessment of alternatives. Instead of delivering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it presents a narrative account of project evolution. This method does not convincingly show that less harmful options

have been appropriately identified, evaluated, and chosen over more damaging ones.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application lacks evidence that the developer has genuinely contemplated positioning the turbines further offshore, where potential visual, ecological, and coastal impacts may be lessened. The sensitivity of the West Lewis coastline, coupled with the critical importance of distance from the shore in assessing impact, makes this omission significant. Consequently, without such an analysis, it is impossible to determine whether the proposed siting is indeed the least damaging option.

The weaknesses extend to the evaluation of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly examined to avoid or mitigate impacts on sensitive receptors, which include culturally and spiritually significant areas such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design mitigation measures. As a result, the application does not adequately demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This lack of adherence to the established mitigation hierarchy prevents the competent authority from determining if less harmful and more suitable alternatives might exist.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a material shortcoming that leads to the conclusion that the application has not been properly assessed and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with this application is significantly lacking, failing to offer a complete and trustworthy understanding of the ecological receptors within the West Lewis coastal area. This marine environment is both highly sensitive and biologically active, yet the baseline data presented is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat utilisation of various species, which compromises the ability to assess potential impacts reliably.

Particularly concerning is the omission regarding otters, classified as a European Protected Species. The application inadequately acknowledges their active use of the coastal regions for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. Consequently, the potential impacts stemming from construction-related disturbances, noise, and increased human activity have not been thoroughly assessed, undermining claims of no significant effects on this species.

Moreover, the assessment of basking sharks suffers from deficiencies, as it relies heavily on aerial surveys, which introduce substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate they frequently utilise these waters. The oversight of relevant data leaves the baseline incomplete and further weakens the credibility of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on unsubstantiated assumptions rather than sound evidence. Additionally, the lack of comprehensive baseline data hampers meaningful evaluations of cumulative and indirect impacts, failing to account for seasonal variations and broader ecosystem interactions. This situation results in uncertainty regarding the actual risks faced by marine species and habitats.

Regulatory obligations are also not met, as the application does not adequately identify or assess protected species, failing to satisfy the standards set by the Environmental Impact Assessment regime and National Planning Framework 4. The uncertainty created prevents the assurance of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, lawful consent cannot be granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, culminating in the assertion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal has significant shortcomings in its assessment of cultural heritage and community identity. It overlooks the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. Instead, the application takes a narrow view, treating heritage as a collection of separate and static assets. This approach fails to recognise the ongoing social, cultural, and spiritual roles these assets play in the community.

One major issue is the evaluation of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual significance, yet they are classified as static features in the assessment. This mischaracterisation ignores their current use and the impact of proposed development on their surroundings, leading to an incomplete understanding of cultural effects and neglecting their importance in community life.

Additionally, the application does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it acknowledge the long-standing relationship between the community and its coastal environment. These factors are crucial to the area's identity but are completely absent from the assessment, which is a notable oversight. Without this context, the cultural implications of the development cannot be comprehensively evaluated.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as having a distinct cultural identity akin to Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not comply with recognised principles for participation in decisions affecting cultural and environmental matters.

A significant procedural shortfall is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to consider the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

These issues also conflict with policy requirements, particularly those outlined in the National Planning Framework 4, which emphasises the protection of historic assets and places. The failure to account for both tangible and intangible heritage and to acknowledge living cultural practices marks a clear deviation from policy standards.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately addressed, and the application lacks a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a significant concern that compromises the integrity of the evaluation process. While the developer engaged local residents through focus groups as part of this assessment, the full report remains unpublished, leading to a critical evidential gap. This omission prevents both the public and the competent authority from fully grasping the social risks that have been identified in the developer's own research.

Furthermore, existing evidence reveals that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are directly linked to community engagement and are therefore substantiated, not speculative. The failure to disclose the complete assessment hampers proper scrutiny of these findings, thus limiting the ability to understand their significance in the decision-making process.

Additionally, there are indications that the proposal threatens community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Yet, these concerns have not been adequately incorporated into the main application nor given the attention they deserve. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency also undermines the Environmental Impact Assessment process. A

comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning could be compromised. The failure to provide the complete dataset means the application lacks a thorough evidential basis for weighing benefits against potential harm.

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

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material shortcoming within the application and a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment framework.

In summary, the decision to withhold the full Social Impact Assessment, coupled with the evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs lawful determination and underscores the conclusion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed and does not adequately account for the significant scale of change or the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the extent of this visual change accurately. The large scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not sufficiently convey the significance of this impact in the context of such a sensitive landscape.

Concerns are also evident regarding the methodology used in selecting and presenting visual viewpoints. There is evidence suggesting that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, thus compromising the assessment's reliability.

Another critical deficiency is the failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets instead of recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The magnitude of change is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy.

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

In summary, the assessment does not accurately depict the magnitude of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant risks to the sensitive West Lewis coastline, which is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. The assessment of construction and pollution risks is notably incomplete, lacking the necessary detail to evaluate potential environmental effects. The application does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans, instead depending on mitigation and contingency measures that are to be prepared after consent has been granted. This reliance on undefined future measures raises considerable concerns, especially given the delicate nature of the receiving environment.

The application acknowledges various risks, including sediment mobilisation and the potential for accidental chemical or oil spills. However, it fails to provide adequate information on the strategies that will be implemented to prevent, control, or monitor these risks. Furthermore, there is considerable uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable

installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances, which could adversely affect marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning to a post-consent phase, the proposal undermines the ability to assess whether appropriate safeguards are in place for responding to pollution events. This creates procedural risks and hinders the competent authority's capacity to evaluate 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 need to be thoroughly assessed prior to consent; when such information is absent, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with the policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty about potential impacts results in an assessment that is materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents substantial risks to marine species, particularly due to underwater noise generated during construction activities. The prolonged use of high-energy hammer piling is expected to disturb species, such as dolphins, across large distances. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious; however, the application downplays the significance of these effects, lacking sufficient supporting evidence.

Furthermore, the assessment of fisheries and marine life is inadequate, failing to provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast support both a diverse marine ecosystem and an active fishing industry. Nevertheless, the application does not convincingly demonstrate that these vital uses and habitats can be preserved without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds exist, are accessible, or can accommodate additional pressure. This significant omission risks overfishing in other areas and may lead to broader economic ramifications for the local fleet. Without a clear, evidence-based assessment, the impacts on fisheries and local livelihoods remain poorly understood.

There are notable inconsistencies within the application regarding the need for licences

to permit harm to European Protected Species, which are acknowledged while impacts are simultaneously described as negligible. This contradiction undermines the assessment's credibility and raises compliance concerns with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Additionally, the assessment does not take into account cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. 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 fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the proposal represents sustainable development.

In light of these deficiencies, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions, the assessment remains incomplete and unreliable. These shortcomings obstruct a robust evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally incomplete, failing to recognise the interconnected nature of the offshore turbines and the onshore works. These components are assessed independently, leading to a fragmented evaluation that conceals the true extent of environmental and socio-economic consequences.

The onshore project includes the construction of a substation near Stornoway, cabling across protected moorland, and additional access infrastructure through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts means that the overall environmental footprint of the project remains unclear.

By neglecting the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be evaluated together; however, the distinction between offshore and onshore elements prevents a full understanding of the combined effects on peatlands, habitats, and local communities.

There are significant risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not adequately demonstrate that the impacts on these habitats have been fully assessed or that appropriate 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, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application falls short in addressing this issue and fails to establish that the overall carbon balance remains favourable.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include an assessment of dark skies and nocturnal wildlife, which represents a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment.

Additionally, the application does not evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important given the role of dark skies in the area's identity and the growth of tourism sectors such as astro-tourism. The lack of consideration for these effects indicates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the potential effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting because of phototaxis, which can lead to disorientation and a higher risk of collision. The proposal lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or increase mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity and associated risks.

Species like Kittiwakes may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting. The absence of site-specific night-time data creates a crucial 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 required evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and prevents 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 broader evaluation of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

TOURISM

The Isle of Lewis relies heavily on its tourism sector, which has seen significant 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 local economy. The assessment of tourism impacts related to the proposed development is materially deficient, neglecting to evaluate the economic and social consequences for this crucial sector. The application acknowledges that 86% of visitors are attracted by the area's scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might affect visitor numbers, behaviour, or overall economic contribution.

Additionally, the analysis does not consider the vital role that environmental quality plays in supporting tourism. Key elements such as unspoiled landscapes and dark skies are essential to the visitor experience and contribute to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the potential impacts on a recognized and expanding part of the local economy.

In an island community with limited economic diversification, the failure to assess the implications for tourism extends beyond economics, affecting employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly 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 demonstrate net benefit. It also contradicts strategic objectives that

highlight tourism as a priority growth sector. Consequently, the lack of sufficient evidence prevents the competent authority from adequately assessing the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and indicates that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails fundamentally to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application recapitulates the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was determined. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not rectify past deficiencies.

The evidential basis for determination is both incomplete and unreliable. There are notable gaps in baseline data, an undefined design envelope is maintained, and unspecified reliance on mitigation measures persists. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failings are evident, notably the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage. It lacks evidence that health and wellbeing impacts are acceptable and fails to provide a net economic benefit due to insufficient tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, masking effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal are both uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful

determination of acceptable impacts.

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

Collectively, these deficiencies in the application render it procedurally and substantively unfit for determination. The significant information gaps, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to mandate the submission of the missing information.

Consequently, 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: 426D5ABB

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is flawed and does not give a full or clear account of the environmental effects of the proposal. The use of a flexible Project Design Envelope means there are no specific commitments to turbine dimensions, layouts, or configurations. This creates uncertainty and complicates the application of a worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development, leaving both the public and the competent authority unable to grasp the true extent of the environmental effects.

The application depends on mitigation measures, monitoring strategies, and management plans that have not been defined. This means consent is sought on the understanding that environmental harm will be dealt with later, which obstructs any meaningful evaluation of their 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 requires that significant effects and mitigation strategies are established prior to making decisions.

There are also serious gaps in evidence, such as missing baseline data and methodological limitations. Reliance on assumptions instead of site-specific evidence adds to the uncertainty regarding the impact's scale and significance. Conclusions of negligible or non-significant effects lack robust supporting data, and the insufficient information hampers a clear understanding of cumulative and worst-case impacts. This introduces scientific uncertainty that does not meet 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 brings the precautionary principle into play, especially concerning protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the reliance on an undefined design envelope, lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a proper and lawful assessment of environmental effects, which means the competent authority cannot 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. 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 ornithological assessment associated with the development proposal is fundamentally flawed, containing significant gaps in evidence and inconsistencies that question its conclusions. This proposed development is situated on the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are located nearby, yet the assessment fails to properly evaluate the risks of displacement, collision, and habitat loss.

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

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

The proposed turbine siting within a recognised migratory corridor introduces further risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor, particularly concerning species with small global populations, are not adequately assessed in the application.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, failing to recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are interconnected. The application employs a simplistic approach, viewing heritage as separate, unchanging assets instead of acknowledging their continuous social, cultural, and spiritual roles within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as

the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice; however, the assessment characterises them merely as static features, overlooking their ongoing use, significance, and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and neglects their importance in community life.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate and does not properly address the extent of the anticipated change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would impose a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible change to the landscape.

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

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

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

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

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

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

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to provide a sufficient assessment of fisheries and marine life, leaving critical ecological and socio-economic impacts unexamined. It does not demonstrate that these habitats and uses can be protected or maintained without significant disruption.

A primary concern is the flawed assumption that fishing activity can be displaced without consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or capable of handling increased pressure. This significant omission raises the risk of overfishing in other areas and could have wider economic repercussions for the local fishing fleet. The implications for fisheries and livelihoods cannot be properly assessed without a clear and evidence-based approach.

Furthermore, the proposal poses considerable risks to marine species, particularly due to underwater noise during construction. The use of high-energy hammer piling over an extended duration is likely to disturb marine life across large distances, notably impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate evidence.

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

Additionally, the assessment does not address cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough 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 align with National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, precluding any assertion that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application proposes significant onshore infrastructure related to an integrated project involving offshore turbines and associated works. However, the assessment of the onshore elements is materially incomplete, failing to consider the full extent of

impacts. The onshore works encompass cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As a result, the application does not provide a thorough evaluation of the environmental footprint, preventing a complete understanding of the project's impacts.

The separation of the onshore and offshore components leads to a fragmented approach, which obscures the true scale of environmental and socio-economic effects. This lack of a comprehensive assessment also hinders the ability to evaluate cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the current assessment fails to integrate the combined effects on peatlands, habitats, and local communities.

Moreover, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The proposal does not adequately demonstrate that impacts on these habitats have been fully assessed, nor does it show that appropriate avoidance measures are in place. This raises a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the disturbance of peatland, which releases stored carbon and potentially creates a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this issue and fails to demonstrate that the overall carbon balance remains positive.

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

From a policy perspective, the failure to assess the project as a cohesive whole and the inability to demonstrate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. This further undermines the application, as it does not show that impacts can be avoided or mitigated.

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 part of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is markedly deficient in its evaluation of nocturnal wildlife and dark skies, which constitutes a significant omission. The coastline of West Lewis is noted for its exceptionally dark skies, integral to both

environmental quality and cultural identity, as well as being a draw for tourism. The proposal intends to install permanent red aviation lighting that would be observable over considerable distances, thereby creating a persistent and intrusive "wall of light" across the western horizon, fundamentally altering the nocturnal environment.

There is no assessment of how this lighting would impact visual amenity, landscape character, or the experiences of local residents and visitors. Such an oversight is particularly significant in light of the role that dark skies play in the area's identity and the burgeoning sector of astro-tourism. This lack of consideration introduces a clear deficiency in the comprehensive landscape and environmental evaluation.

More importantly, the proposal fails to include an evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially susceptible to artificial lighting due to their phototactic responses, which can cause disorientation and raise the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, resulting in an inadequate evaluation of how aviation lighting may affect these species or contribute to increased mortality.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately address nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this potential hazard has not been examined. The absence of data specific to night-time conditions creates a crucial gap in the understanding of ecological impacts.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions contradict the guidelines set forth in the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Moreover, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecological framework.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analyses render the application incomplete and inadequate for a lawful decision-making process.

TOURISM

The assessment regarding tourism impacts is severely inadequate and does not adequately evaluate the economic and social repercussions for a crucial part of the Isle

of Lewis's economy. The island's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are vital to tourism, which thrives on these natural attributes. The application recognises that 86% of visitors are attracted by the scenery, yet it neglects to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen remarkable growth, rising from £65 million in 2017 to more than £81.5 million, while also supporting over 1,000 jobs and making up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and flourishing sector.

The assessment further neglects to recognise the crucial role of environmental quality in tourism, particularly the significance of unspoiled landscapes and dark skies for visitor satisfaction and the growth of niche markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this deficiency, leaving a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the island community's limited economic diversification, the lack of assessment regarding tourism impacts 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 mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impacts and the necessity to show 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 evaluate the economic ramifications of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and recognising the island's economic dependency create a significant evidential gap. This hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

complete and reliable evidential basis for decision-making.

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

In addition to the evidential gaps, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social Impact Assessment is a significant omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

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

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

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

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

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: 21000861

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies related to planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposal raises serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development due to its scale, proximity, and design.

The application lacks an adequate 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. Key components of the proposal remain unclear, and the flexible design framework employed hinders a proper assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures calls into question their effectiveness, rendering the documentation inadequate for a comprehensive understanding of the potential environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and substantial. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests essential for obtaining consent and impair the competent authority's ability to determine whether the development is policy-compliant.

The scale of the proposal is unprecedented for this location, as it includes large turbines positioned very close to the shoreline, which raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the West Lewis coastal environment is fundamentally flawed, lacking a complete and reliable understanding of the area's ecological receptors. This marine system is both sensitive and biologically active, yet the methodologies employed do not sufficiently capture the presence, behaviour, or habitat use of key species. Consequently, the assessment fails to provide a sound evidential basis for evaluating potential impacts.

One significant oversight involves otters, a European Protected Species, which have not been properly recognised or assessed in their use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate evaluation of how construction disturbance, noise, and increased activity could affect them. This lack of assessment undermines any assertions regarding the absence of significant effects on this species.

Additionally, the evaluation of basking sharks is inadequate due to an overreliance on aerial surveys, which introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that show frequent use of these waters. The disregard for such data results in an incomplete baseline, further weakening the reliability of the assessment's conclusions.

These methodological shortcomings mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of comprehensive baseline data obstructs a meaningful assessment of cumulative and indirect impacts, such as seasonal variations 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 fulfil the necessary requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thus activating the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns regarding its impact on the ornithological landscape of the Isle of Lewis. The assessment provided is fundamentally flawed, exhibiting considerable gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to convincingly demonstrate that these species will remain unaffected, especially given that the development is situated within key foraging areas and migratory pathways. There is insufficient evaluation of the potential implications of displacement, collision risk, and habitat loss.

A notable contradiction arises in the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats

Regulations derogation case, which is only required if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that its conclusions are not substantiated by the available evidence. The assessment does not adequately ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The critical nature of these feeding grounds has not been fully considered, and the reliance on modelling methods introduces uncertainties, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses remain inadequately understood.

Moreover, the placement of turbines within a known migratory corridor adds a significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality in this corridor and the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application does not meet the necessary evidential threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, preventing a lawful conclusion that would support consent.

The identified deficiencies also reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these factors render the assessment unreliable, plagued by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a robust evaluation of potential impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a living cultural landscape. The connection between the environment, language, tradition, and community is overlooked in the application, which adopts a reductive view of heritage as isolated and static assets, rather than considering their dynamic social, cultural, and spiritual roles within the community.

Significant deficiencies arise in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are classified in the assessment as static features, neglecting their ongoing use and significance. This mischaracterisation leads to an incomplete evaluation of cultural effects and fails to appreciate the cemeteries'

role in community life.

Moreover, the application does not address intangible cultural heritage elements, which include the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, resulting in a substantial oversight. Without considering these elements, the true cultural impact of the development cannot be comprehensively understood.

There are also critical issues concerning community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's credibility and does not align with the established principles regarding participation in matters that affect cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal responsibilities to evaluate the social, cultural, and economic repercussions on the island community, thereby hindering a lawful determination of the application.

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

In conclusion, the failure to adequately consider living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The assessment does not properly evaluate the cultural impacts of the development, nor does it provide a sufficient basis for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This development would create a dominant industrial presence that would fundamentally alter the existing landscape, resulting in a permanent and irreversible transformation.

The assessment conducted fails to adequately represent the magnitude of the visual change that would occur. Given their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The report does not effectively convey the significance of these impacts

within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been underestimated, compromising the assessment's reliability.

Additionally, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape and are visually and spatially linked to the Atlantic horizon. However, the assessment treats these sites as isolated, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This not only represents a visual impact but also signifies broader cultural and spatial harm, which has not been sufficiently addressed in the application.

From a policy standpoint, this proposal contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The absence of a thorough worst-case assessment further undermines any claim of compliance with policy.

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

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail to adequately assess construction and pollution risks, presenting significant concerns about potential environmental impacts. It entails extensive seabed preparation and installation within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application leans heavily on future mitigation and contingency measures that will be formulated post-consent, which hinders any meaningful evaluation of their potential effectiveness.

Given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and essential habitats susceptible to sediment disturbance and contamination, this approach raises serious alarms. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate information on prevention, control, or monitoring strategies.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the potential extent, duration, or ecological consequences of these impacts. This uncertainty extends to the possible effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

Compounding these issues is the failure to include detailed emergency response procedures. By postponing the development of contingency plans to a later stage, the application obstructs the evaluation of whether suitable safeguards will be in place for pollution events. This situation introduces procedural risks and hampers the competent authority's ability to assess the environmental protection measures prior to the final decision.

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the requirements stipulated by the Environmental Impact Assessment regime. It is essential to assess likely significant effects and mitigation before consent is granted. The absence of such critical information means a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with existing policy requirements related to environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment fundamentally inadequate. These shortcomings prevent a thorough evaluation of construction and pollution risks, further corroborating the assertion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed, particularly concerning the evaluation of onshore infrastructure. It fails to address the full scope of impacts that arise from what constitutes a single integrated project. The assessment of the offshore turbines and onshore works is conducted separately, resulting in a disjointed approach that obscures the true magnitude of environmental and socio-economic consequences.

Onshore activities encompass cabling through protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of associated access infrastructure across sensitive landscapes. Such works involve the excavation of deep peat areas, especially within Barvas Moor, which serves as a significant carbon

reservoir and is an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, thus hindering a complete understanding of the overall environmental footprint of the project.

The proposal raises serious concerns regarding carbon balance, as the disturbance of peatland can release stored carbon, leading to a potential carbon debt that contradicts the principles of renewable energy development. The application does not sufficiently address this matter nor does it demonstrate that the overall carbon balance remains advantageous. Furthermore, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not supply evidence that the requisite consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

Moreover, the absence of a comprehensive assessment prevents an accurate evaluation of cumulative effects, which is required under the Environmental Impact Assessment process. The separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and communities remain inadequately understood. There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are under policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been adopted, resulting in a clear evidential gap concerning biodiversity protection.

From a policy standpoint, the failure to consider the project in its entirety and to show protection of peatlands, habitats, and land use interests contravenes the National Marine Plan and the National Planning Framework 4. The inability to prove that impacts can be effectively avoided or mitigated further weakens the application. Collectively, the separation of project elements, lack of a comprehensive assessment, and insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thus obstructing 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 environmental quality, cultural identity, and tourism value of the area. However, the Environmental Impact Assessment lacks any assessment of dark skies and nocturnal wildlife, representing a serious omission. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

This application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Such an omission is particularly concerning considering the significance of dark skies to the area's identity and the potential for emerging tourism sectors like astro-tourism. The failure to consider these factors results in a notable gap in the overall assessment of landscape and environmental impacts.

Furthermore, there is no examination of how the lighting would 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 elevate the risk of collisions. The application does not include a lighting impact assessment or a study on phototaxis, meaning that it fails to evaluate the potential effects of aviation lighting on these species and their mortality rates.

This issue is worsened by the dependence on daytime survey data in the ornithological assessment, which does not consider nocturnal activities or 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 implications.

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

From a policy standpoint, the absence of such assessments contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is integral to the environment.

In conclusion, 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 unable to support a lawful determination.

TOURISM

The application fails to adequately assess the tourism impacts, which are crucial for the economy of the Isle of Lewis. It overlooks the economic and social consequences that affect a key sector. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million. It supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model how the potential industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added and the broader economic resilience. Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or harm an established and expanding sector.

Additionally, the assessment does not address the importance of environmental quality for tourism. It fails to recognise how unspoiled landscapes and dark skies enhance visitor experience and support 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 growing segment of the local economy.

In an island community that has limited economic diversification, the neglect to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as required by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It conflicts with strategic objectives that recognise tourism as a priority growth sector. Furthermore, it fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the lack of quantification regarding tourism impacts, the failure to assess environmental drivers of visitor behaviour, and the consideration of the island's economic dependency result in a substantial evidential gap. This gap hinders 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 is fundamentally flawed, failing to meet the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. It replicates the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current application is put forth under a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential basis for the determination of this application. It lacks comprehensive baseline data, utilises an undefined design envelope, and depends on unspecified mitigation measures. Furthermore, significant impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, the implications of full onshore infrastructure, and impacts on tourism. The Environmental Impact Assessment is therefore incomplete and fails to adequately convey the likely significant effects or residual impacts.

Additionally, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018. There is also a significant omission regarding the full disclosure of the Social

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

This proposal is in direct violation of National Planning Framework 4, which requires the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and fails to provide evidence of a net economic benefit due to a lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, leaving unclear the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 605D9344

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 incomplete and lacks a clear account of the potential environmental effects of the proposal. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates uncertainty and hinders a consistent worst-case scenario analysis. This compromises the assessment's integrity and means that the impacts reported may not accurately represent the actual development, leaving both the public and the relevant authorities unable to understand the true environmental implications.

The application depends on mitigation measures, management plans, and monitoring strategies that have yet to be defined. Therefore, consent is being sought with the understanding that any environmental harm will be addressed later, making it impossible to properly evaluate the effectiveness of these measures or assess residual impacts. This postponement of critical information to post-consent stages is not acceptable and contradicts the aims of the Environmental Impact Assessment framework, which demands that likely significant effects and mitigation strategies be clearly outlined before any decision is made.

There are also critical gaps in evidence, including a lack of baseline data and methodological limitations, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where conclusions indicate negligible effects without solid supporting data. The insufficient information hampers a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory obligations.

As a result, the application does not meet the evidential standard required under the Habitats Regulations to prove the absence of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Furthermore, the proposal fails to show compliance with National Planning Framework 4, particularly the requirements for biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that adequate 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 make the Environmental Impact Assessment Report unreliable and inadequate. These shortcomings prevent a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in this application is fundamentally flawed and fails to adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a coherent and reasoned evaluation of realistic alternatives with regard to environmental impacts, the application merely recounts the project's development history. This lack of structured analysis does not illustrate that less harmful alternatives have been adequately identified, assessed, and

chosen over more damaging options.

Moreover, there is a distinct absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered positioning the turbines further offshore, a move that could potentially mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline, where proximity to shore is crucial in assessing impact, the lack of such an analysis undermines any assertion that the proposed siting is the least damaging option.

These shortcomings are evident in the evaluation of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to minimise impacts on sensitive areas. This includes vital sites of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, alongside the lack of comparative analysis, reveals that the principle of mitigation by design has not been properly implemented, leading to an over-reliance on remedial measures after the design phase.

Consequently, the application does not convincingly demonstrate that environmental harm has been reduced through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy obstructs the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives available. A robust assessment of alternatives is essential; without it, it cannot be determined that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy jeopardises alignment with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw, which further contributes to the conclusion that the application has not been sufficiently evaluated and is unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment fails to adequately identify and evaluate protected species, specifically otters, which are a European Protected Species. The application does not recognise their foraging and movement patterns along the coast. This oversight means that the potential impacts from construction activities, noise, and increased human presence have not been properly assessed. Consequently, the conclusions regarding the lack of significant effects on otters are not credible.

The methodologies used in the assessment are also problematic, particularly in relation to basking sharks. Aerial surveys are relied upon, which can create a significant detection bias, especially under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially when compared to

established observations from land that show frequent use of these waters. The failure to properly consider this data leads to an incomplete understanding and compromises the conclusions drawn.

There are broader implications arising from these methodological deficiencies. The conclusions that suggest negligible effects are based on assumptions rather than strong evidence. Furthermore, the lack of comprehensive baseline data limits the ability to assess cumulative and indirect impacts on marine species, particularly considering seasonal variations and the interactions within the wider ecosystem. This introduces uncertainty about the actual risks to marine habitats and species.

From a regulatory viewpoint, the application does not adhere to the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. The failure to adequately identify and assess protected species means that uncertainties about adverse effects cannot be dismissed with reasonable scientific certainty, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical inconsistency arises within the application itself, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is applicable only when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and raises questions about the support provided by the underlying evidence. Furthermore, the assessment fails to adequately demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches leads to uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed likely underestimate mortality, especially given incomplete baseline data and an insufficient understanding of behavioural responses.

Siting turbines within a recognised migratory corridor introduces further risk by creating

a barrier in a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of sustained mortality in this corridor or the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This necessitates the application of the precautionary principle, precluding a lawful conclusion in support of consent.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight disregards their continued use, meaning, and the impact that development could have on their setting. As a result, the evaluation of cultural effects is incomplete and ignores their vital role in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is severely lacking, leading to significant concerns about the adequacy of the evaluation. Although the developer engaged in a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence restricts both public insight and the competent authority's understanding of the social risks highlighted in the developer's own research.

Local residents are already feeling measurable stress, anxiety, and worry due to the scale and proximity of the proposed development. These effects are based on direct engagement with the community and are not speculative. However, the absence of the complete assessment hampers thorough scrutiny of the findings and limits the ability to evaluate their importance in the decision-making process.

Moreover, there is a perception among community members that the proposal threatens their identity and cohesion, with indications of "cultural loss" appearing in the developer's findings. Unfortunately, these impacts have not been adequately considered in the main application, nor have they been given the weight they deserve. The decision to withhold the full Social Impact Assessment conceals the actual human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application fails to provide a solid evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application falls short of demonstrating adherence to National Planning Framework 4 concerning health and wellbeing. Development should

foster positive health outcomes and mitigate harm; however, the evidence currently suggests pre-existing adverse effects that have not been adequately disclosed. Therefore, without the full assessment, it is impossible to confirm compliance with this policy.

The implications for procedure are significant, as the competent authority cannot perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts results in an incomplete and unreliable assessment. This inadequacy obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for the introduction of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The presence of these turbines would lead to a continuous industrial presence that fundamentally changes this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not adequately illustrate the extent of the anticipated visual change. The turbines' size and proximity would dominate views from residential areas, historic sites, and popular coastal locations. This would detract from visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact in a landscape of such sensitivity.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that certain viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This suggests that the magnitude of the visual impact may be understated, casting doubt on the assessment's reliability.

Additionally, the assessment neglects to explore 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 that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence and leads 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 perceived and severing their connection to the natural horizon. This results in not only visual repercussions but also a more profound cultural and spatial degradation that has not been adequately addressed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The proposed changes are at odds with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant. Thus, the resultant change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, the assessment fails to represent the full extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks sufficient detail regarding construction and pollution risks, which is necessary to assess likely environmental impacts. It proposes substantial seabed preparation and installation works within a high-energy Atlantic environment but does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be developed after consent, which prevents a meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is troubling due to the sensitivity of the surrounding environment. The West Lewis coastline has clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not offer adequate details on how these risks will be prevented, controlled, or monitored.

Uncertainty also exists regarding the scale and behaviour of sediment plumes from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential effects on marine species and habitats that have been recognised as sensitive in the wider assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent stage, the application hampers the evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures before making a determination.

From a regulatory viewpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application fails to provide a robust evaluation of ecological or socio-economic impacts. The assessment of fisheries and marine life is insufficient, as it does not demonstrate that these vital uses and habitats can be protected or maintained without significant disruption.

A critical issue arises from the assumption that fishing activity can be displaced without consequence. The application lacks evidence that alternative fishing grounds exist, are accessible, or can support additional pressure. This significant omission risks overfishing in other areas, potentially leading to wider economic consequences for the local fleet. Without a clear, evidence-based assessment, the effects on fisheries and livelihoods cannot be fully understood.

The proposal poses substantial risks to marine species, particularly due to underwater noise generated during construction. High-energy hammer piling over an extended period is likely to cause disturbance across considerable distances, affecting species such as dolphins. There are serious concerns regarding predicted disturbance to a significant proportion of the local bottlenose dolphin population, yet the application downplays the significance of these effects, lacking sufficient supporting evidence.

There is also an inconsistency within the application, where the need for licences to permit harm to European Protected Species is acknowledged, while impacts are simultaneously deemed negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not adequately consider cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. 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 perspective, the application fails to demonstrate compliance 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, which prevents any conclusion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines and onshore works as part of a single integrated project is fundamentally flawed, as it neglects to consider the full range of impacts. The onshore elements, which include cabling across protected moorland and the construction of a substation near Stornoway, are inextricably linked to the offshore components. However, by assessing these elements separately, the application presents a disjointed view that obscures the overall environmental and socio-economic consequences of the project.

The proposed infrastructure involves excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The failure to comprehensively assess these impacts leads to an incomplete understanding of the project's environmental footprint. Furthermore, by excluding or deferring the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project are considered collectively, but the current separation results in an inadequate understanding of the combined impacts on peatlands, habitats, and communities.

Additionally, the proposal poses considerable risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application lacks evidence that the potential impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures are in place, indicating a significant gap in biodiversity protection.

Concerns regarding carbon balance are also pertinent, as the disturbance of peatland may release stored carbon, thereby potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this aspect or demonstrate that the overall carbon balance is indeed beneficial.

The routing of the infrastructure through active croft land raises further issues, potentially conflicting with existing land use and legal rights. There is no evidence that the necessary consents or processes have been initiated, which raises questions about the project's deliverability and lawful execution.

From a policy standpoint, the disjointed assessment and failure to demonstrate

protection of peatlands, habitats, and land use interests conflict with both the National Marine Plan and National Planning Framework 4. The inability to show 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 the absence of substantiated evidence regarding environmental and land use impacts result in an incomplete and unreliable application, ultimately preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline boasts exceptionally dark skies, which are crucial for the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible across long distances, creating an intrusive “wall of light” effect that will fundamentally change the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is particularly concerning given the significance of dark skies to the local identity and the emerging astro-tourism sector. Consequently, there exists a clear gap in the overall landscape and environmental assessment due to this oversight.

Equally concerning is the complete absence of an evaluation regarding the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly susceptible to artificial lighting, as it can lead to disorientation and increased collision risks. The application lacks any lighting impact assessment or phototaxis study, thereby failing to examine how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

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

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

From a policy standpoint, these omissions directly conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also weaken the overall assessment of landscape and seascape impacts, as night-time

character is an integral part 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 incapable of supporting a lawful determination.

TOURISM

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

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

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

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

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

Collectively, the shortcomings in quantifying tourism impacts, assessing the

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

SUMMARY

The 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

I object to the proposed development on the following grounds;

1. Incomplete information
2. 'Fix it later' Promises
3. Economic Damage to Lewis
4. Ignoring our Culture
5. Hidden Impacts on Mental Health
6. Fishing, Marine Life, and Protected Species
7. Risks to Bird Life
8. Failure to Help Nature and Pollution Risks
9. Destroying Our Dark Skies
10. Cumulative Devastation and Onshore Damage
1. Incomplete Information

In planning terms, the Environmental Impact Assessment Report (EIAR) is deficient because it lacks site-specific data and fails to assess a realistic worst-case scenario:

- The application represents a deficient EIAR because it contains significant gaps in baseline data regarding local species. (National Marine Plan; NPF4 Policy 1)
- The developer has made a failure to apply a realistic worst-case scenario, meaning the true impacts remain unknown. (Electricity Works (EIA) (Scotland) Regulations 2017)
- The use of the Rochdale Envelope principle in this sensitive location is inappropriate as it masks the scale of environmental harm. (NPF4 Policy 4; Marine Scotland Guidance)

2. 'Fix it Later' Promises

In planning terms it is problematic to rely on post-consent mitigation. The authorities cannot judge if the project is safe if the solutions are not provided before the decision is made:

- I object to the reliance on post-consent mitigation, as the effectiveness of these measures cannot be scrutinized now. (NPF4 Policy 3; Habitats Regulations)

- The proposal suffers from procedural uncertainty, as key protection plans have been deferred until after permission is granted. (Planning and Infrastructure Act 2025)
- The pre-determination of mitigation without evidence-based results fails the test of a robust planning application. (NPF4 Policy 1)

3. Economic Damage to Lewis

In planning terms, the project violates Community Wealth Building policies and risks cannibalising our local workforce:

- The proposal creates a significant socio-economic imbalance and facilitates the benefit export of wealth away from the island. (NPF4 Policy 25; National Marine Plan Policy GEN 2)

- The EIAR fails to model how the "high magnitude of change" to the seascape will reduce

Tourism Gross Value Added (GVA) (NPF4 Policy 30; LDP Policy ED1)

- The lack of a compliant Island Communities Impact Assessment (ICIA) means the vulnerability of the vital tourism sector hasn't been legally evaluated (Islands (Scotland) Act 2018;

NPF4 Policy 4)

- Lack of assessment of industry cannibalisation, where the project causes labour displacement from our vital care and tourism sectors. (NPF4 Policy 30)
- The development fails the NPF4 Policy 25 mandate for Community Wealth Building. (NPF4 Policy 25)

4. Ignoring our Culture

In planning terms, the developer has failed to assess intangible heritage and the living landscape, violating the requirement to protect the unique cultural identity of our island communities:

- The assessment fails NPF4 Policy 7 by ignoring the intangible and living heritage of the West

Side community. (NPF4 Policy 7; Historic Environment Policy for Scotland (HEPS))

- There has been an inadequate Island Communities Impact Assessment (ICIA) regarding the

impact on Gaelic culture and local traditions. (Islands (Scotland) Act 2018)

- The project fails to respect the Cultural Landscape as a whole, treating historic sites as

isolated objects rather than a living environment. (LDP Policy EH1; NPF4 Policy 7)

5. Hidden Impacts on Mental Health

In planning terms, by not disclosing the full Social Impact Assessment (SIA) data, the developer has prevented the community from seeing the true health risks:

- I object to the non-disclosure of social impact data, which prevents a transparent assessment

of the project's risks. (NPF4 Policy 14; Aarhus Convention)

- The proposal will have a documented adverse impact on mental health and wellbeing, which is a material violation of NPF4 Policy 14. (NPF4 Policy 14 (Health and Wellbeing))

6. Fishing, Marine Life, and Protected Species

In Plain English:

The developer's study of West Lewis waters is dangerously incomplete, not taking into account the full impact on the local fishing industry and marine life.

In planning terms the proposal fails to provide a robust evidence base for marine mammals and ignores the displacement of the local fishing fleet:

- "The application contains significant methodological deficiency by using biased aerial surveys

that ignore established land-based basking shark data." (National Marine Plan Policy GEN 9)

- "The proposal fails NPF4 Policy 11 and NMP Policy GEN 4 as it provides no evidence that

alternative fishing grounds are available to prevent industry cannibalisation." (NPF4 Policy 11;

NMP Policy GEN 4)

- "The requirement for European Protected Species (EPS) licenses proves that environmental

impacts are not 'negligible' as claimed." (NPF4 Policy 3; EPS Regulations)

7. Risks to Bird Life

This area is a vital feeding ground and a major highway for migrating birds. The developer is trying to bypass nature laws because they know the project will likely harm protected species.

In planning terms, the developer has already filed a Derogation Case, which is a legal loophole used when a project admits it will definitely damage a protected area:

- The developer's own Habitats Appraisal Derogation Case proves that the project cannot be

completed without damaging protected nature sites. (Habitats Regulations; NPF4 Policy 3)

- The proposal fails the Precautionary Principle, as there is no evidence beyond reasonable

scientific doubt that local bird populations will survive. (National Marine Plan Policy GEN 9)

- I object on the grounds that the project poses an unacceptable risk to SPA-integrity (Special

Protection Areas). (NPF4 Policy 4; Birds Directive)

8. Failure to Help Nature and Pollution Risks

In Scotland, just doing less harm isn't enough anymore. Big projects are legally

required to leave nature in a better state than they found it.

In planning terms, the developer has failed the mandatory Enhancement test required by NPF4:

- The project fails the NPF4 Policy 3 mandate, which requires a measurable net gain for biodiversity, not just mitigation. (NPF4 Policy 3)
- The proposal offers no genuine biodiversity enhancement and fails to contribute to our local

Nature Network. (NPF4 Policy 3(a))

- Failure to provide detailed CEMPs or Pollution Prevention Plans prevents a robust assessment.
- "An Appropriate Assessment cannot conclude 'no adverse effect' given that high-energy piling will disturb 28% of the local bottlenose dolphin population." (NPF4 Policy 4; Habitats Regulations)

9. Destroying Our Dark Skies

Massive flashing red lights on top of every turbine will destroy our view of the stars and disorientate birds that fly at night.

In planning terms, the project will cause a permanent loss of Astronomical Amenity and likely kill nocturnal species through phototaxis (fatal attraction to light):

- The project will result in a permanent loss of astronomical amenity, destroying the West

Side's appeal as a dark sky destination. (NPF4 Policy 30; LDP Policy PD2)

- The developer has failed to establish a proper nocturnal baseline, ignoring the lethal risk to

nocturnal species. (NPF4 Policy 3; Marine Policy Statement)

- The impact of phototaxis (fatal attraction to aviation lighting) on migrating birds has been

dangerously underestimated. (NPF4 Policy 4)

10 Cumulative Devastation and Onshore Damage

The offshore turbines and the onshore cables/substations are actually one single project, but treating them separately hides the true damage to our peatlands, machair and crofting land. The developer has also ignored the cumulative impact of this project alongside other future plans for the area (like N2).

In planning terms, this application represents "Project Splitting" and fails to account for the total environmental and carbon cost to the island:

- The assessment fails to account for the total carbon store degradation caused by digging up

the Barvas Moor peatlands. (NPF4 Policy 1; NPF4 Policy 5 (Soils))

I believe that this development potentially poses a public health risk. To my knowledge, no scientifically based air-quality assessment has been undertaken to quantify the

impacts of fine particulate matter (PM_{2.5}/PM₁₀) from exposed peat or diesel emissions. Without this, the proposal fails the precautionary principle under the Environmental Principles (Scotland) Act 2021. To put it bluntly, air pollution from dried peat dust which is an inevitable by product of this development may contribute to islanders experiencing increased rates of heart attacks and angina, strokes, cancers and chronic lung conditions.

To quote from the World Health Organisation;

'The burden of disease attributable to air pollution is now estimated to be on a par with other major global health risks such as unhealthy diets and tobacco smoking. In 2015, the World Health Assembly adopted a landmark resolution on air quality and health, recognizing air pollution as a risk factor for noncommunicable diseases such as ischaemic heart disease, stroke, chronic obstructive pulmonary disease, asthma and cancer, and the economic toll they take.'

- Failure to assess impacts on irreplaceable machair habitats at the landfall point constitutes a direct breach of NPF4 Policy 3.
- Given the significant "Information Deficiencies," the developer has failed to prove, "beyond reasonable scientific doubt," that the environment will not be irreparably harmed (Habitats Regulations)
- The project is notably inconsistent with the 2008 AMEC/Lewis Wind Power Ministerial Precedent, which established that the Lewis Peatlands SPA constitutes a "national interest" carrying a "weight of importance" that outweighed the benefits of energy production; a conservation priority further strengthened by NPF4 Policy 1, which mandates that significant weight be given to the global climate

I am a lifelong islander, proud of my culture and family of generations of Gaels. I believe that to date public consultation has been superficial, undermining public confidence in a fair process. There are many unresolved questions which should be robustly answered for the sake of our islands, the islanders of today and of future generations. A moratorium on the proposal should be supported until independently verified evidence is provided to address these unanswered questions.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 9F0D1DAC

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 frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, challenging its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of its impact. The use of a flexible design framework obscures likely significant effects, while unspecified mitigation measures prevent assessment of their effectiveness. Consequently, the documentation does not facilitate a fully informed understanding of the environmental, cultural, or community impacts, and the assertion of negligible or non-significant effects lacks robust evidence.

Substantive policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of inadequate information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined design envelope, which lacks commitment to specific turbine dimensions, layouts, or

configurations. This creates considerable uncertainty and undermines the assessment's integrity, making it impossible to accurately evaluate worst-case scenarios. As a result, the impacts presented may not truly represent the development that is ultimately constructed, leaving both the public and the competent authority without a clear understanding of the environmental effects.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a full and reliable account of the likely environmental impacts of the proposal. It depends heavily on undefined mitigation measures, monitoring strategies, and management plans, which have yet to be articulated. By seeking consent based on the premise that environmental harm will be addressed later, the application effectively precludes any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to any determination.

Furthermore, there are notable evidential deficiencies present, including significant gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hinders the ability to clearly understand cumulative and worst-case impacts, thereby introducing scientific uncertainties that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it does not adequately show that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and insufficient baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment accompanying the application presents significant deficiencies, characterised by evidence gaps and internal contradictions that compromise its findings. The application overlooks the internationally important seabird populations found along the west coast of the Isle of Lewis, many of which are already experiencing declines. Furthermore, it fails to demonstrate, to the necessary

evidential standard, that these species will not suffer adverse effects from the proposed development. Key foraging areas and migratory pathways have not been adequately evaluated, particularly regarding displacement, collision risk, and habitat loss.

There exists a critical inconsistency within the application itself, wherein the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. Such a case is only warranted when significant harm is anticipated, raising serious doubts about the credibility of the assessment and suggesting that its conclusions lack the backing of substantial evidence. The assessment also falls short in showing that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling techniques introduces an element of uncertainty, particularly for species already in decline like Kittiwakes and Fulmars. The methodologies employed risk underestimating mortality, especially given the inadequacy of baseline data and the incomplete understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor poses an additional significant risk, creating an obstacle in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential effects on species with relatively small global populations, have not been sufficiently assessed by the application.

From a regulatory standpoint, the application does not 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, alongside data deficiencies and limitations of modelling, signifies that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and precludes a lawful determination in favour of consent. Additionally, the identified deficiencies reflect non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to establish that internationally important seabird populations will not face adverse impacts places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and inadequate evidence. These shortcomings hinder a thorough evaluation of potential impacts and contribute to the conclusion that the application does not meet the statutory requirements essential for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline represents a living cultural landscape where environment, language, tradition, and community are intricately linked. The assessment of cultural heritage and community identity fails to recognise this connection, adopting a reductive

view that treats heritage merely as a collection of static assets. It neglects to acknowledge the ongoing social, cultural, and spiritual functions these heritage sites serve within the community.

Cemeteries at Dalmore, Bragar, and Barvas are examples of culturally significant sites that are active places of burial and spiritual practice. However, the assessment inaccurately categorises them as static features, overlooking their continued use and meaning while failing to consider the impact of development on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, nor does it recognise the longstanding 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 oversight. Without acknowledging these factors, the true cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has 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 compromises the credibility of the assessment and fails to align with established principles of participation in cultural and environmental decisions.

Moreover, the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018, represents a critical procedural failure. Without this assessment, the competent authority is unable to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering the determination of the proposal unlawful.

These shortcomings 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 and to recognise living cultural practices signifies a clear departure from policy requirements.

Ultimately, the neglect 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 without a sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would lead to a significant industrial presence that would change

this character permanently and irreversibly. The current assessment of seascape, landscape, and visual impacts does not adequately capture the extent of this change or the sensitivity of the receiving environment.

The visual change anticipated from the application is not properly represented. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and compromising the naturalness and remoteness of the area. The assessment fails to convey the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been underestimated, undermining the assessment's reliability.

Moreover, the assessment does not take into account the interconnectedness of landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a larger landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated does not acknowledge their interdependence and leads to an incomplete understanding of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and diminishing their connection to the natural horizon. This impact extends beyond visual aspects to include broader cultural and spatial harm, which has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The proposed scale of change is inconsistent 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 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 overwhelming and unavoidable, leading to a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation efforts.

Overall, the assessment fails to adequately reflect the scale of impact, the environmental sensitivity, and the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves extensive seabed preparation and installation works within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This shortfall is troubling, particularly as the application relies on unspecified mitigation and contingency measures that are to be established only after consent is granted. Such an approach obstructs any meaningful assessment of these measures' adequacy and effectiveness.

The West Lewis coastline is home to clean coastal waters and vital habitats, which are at risk of disturbance and contamination from sediment. While the application acknowledges the potential risks of sediment mobilisation and the possibility of chemical or oil spills, it does not adequately detail the strategies for prevention, control, or monitoring of these risks. This inadequacy is concerning given the sensitivity of the receiving environment.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes that may result from seabed disruption and cable installation. Without thorough modelling and clearly defined management strategies, the extent, duration, and ecological impacts of these disturbances remain indeterminate. This uncertainty also applies to potential effects on marine species and habitats that have been identified as sensitive within the broader assessment.

Additionally, the lack of detailed emergency response procedures exacerbates the situation. By postponing contingency planning to a stage after consent, the application hinders the assessment of whether adequate safeguards are available 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 viewpoint, the postponement of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation are assessed prior to consent, and the absence of such information renders a lawful determination impossible. The application further fails to show compliance with policy requirements related to environmental protection and water quality.

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

TOURISM

The assessment regarding tourism impacts in the application 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 area's wild coastline,

nearly untouched landscapes, dark skies, and the sense of remoteness that the island offers. While it is noted that 86% of visitors are attracted by the scenery, the application fails to provide a quantified assessment of how the introduction of large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions of tourism.

The tourism sector has experienced notable 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. Nonetheless, the application does not model how the potential industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or the economic resilience of the area. In the absence of such an analysis, it remains impossible to determine whether the proposed development would yield a net economic benefit or jeopardise a well-established and burgeoning sector.

Additionally, the assessment neglects to consider the critical role of environmental quality in supporting tourism, particularly the value of unspoiled landscapes and dark skies in enhancing visitor experience and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, resulting in a substantial gap in understanding the impacts on a recognised and expanding segment of the local economy.

Considering the context of an island community with limited economic diversification, the failure to assess tourism impacts has broader implications for employment opportunities, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been scrutinised as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not sufficiently demonstrate compliance with the National Planning Framework 4, especially regarding economic impact and the necessity to show a net benefit. Furthermore, it contradicts strategic objectives that identify tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic implications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. It replicates the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed

unacceptable. Presenting the project under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not remedy these shortcomings.

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

Procedural oversights are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C4352DE1

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 arises from an examination of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of the project question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present a sufficient evidential basis for a lawful decision. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The employment of a flexible design framework hinders a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures prevents an assessment of their efficacy. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There exist pronounced and substantial conflicts with policy. The proposal seems 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 sufficiently demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

Moreover, the proposal's scale is unprecedented for this area, with large turbines located in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot substantiate a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not provide a full or reliable account of the likely environmental effects of the proposal. It employs a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders a consistent assessment of worst-case scenarios. As a result, the integrity of the assessment is undermined, leaving both the public and the competent authority unable to grasp the true extent of environmental effects.

Consent for the application is sought based on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach postpones the evaluation of environmental harm, which prevents any meaningful assessment of effectiveness or residual impacts. Deferring key information to post-consent stages is procedurally inappropriate and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are also considerable evidential gaps, including insufficient baseline data and methodological limitations, along with reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly when negligible or non-significant effects are concluded without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold outlined in 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 does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of a thorough and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative detailing the evolution of the project. This method does not convincingly demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Moreover, there is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not show that the developer has adequately considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impacts further highlight the absence of this analysis, which undermines any claims that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to cable routing and landfall assessment, revealing insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been effectively applied, leading to a reliance on post-design mitigation measures instead.

Ultimately, the application does not show that environmental harm has been minimised through the careful selection of site, layout, and routing of infrastructure. This reflects a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a material omission, reinforcing the conclusion that the application has not been properly assessed and is incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to provide a comprehensive understanding of the ecological receptors present. This marine system is known for its high sensitivity and biological activity. However, the baseline data is incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a sound evidential foundation necessary for evaluating potential impacts.

A significant oversight is the assessment of otters, which are classified as a European Protected Species. The application does not adequately acknowledge or evaluate their active use of coastal regions for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the assessment inadequately addresses the potential effects of construction disturbances, noise, and increased activity. This gap undermines any claims regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the methodology relies on aerial surveys that carry inherent detection biases, particularly under Atlantic conditions. This approach is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or appropriately assess such data contributes to an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological issues result in assertions of negligible or non-significant effects being grounded in assumptions rather than solid evidence. The lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it has inadequately identified and assessed protected species. The uncertainty created by these deficiencies prevents the assurance that adverse effects can be excluded 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 presence of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively undermine the reliability of the assessment. These inadequacies obstruct a thorough evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a crucial migratory corridor on the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that call its conclusions into question. The assessment fails to robustly evaluate critical aspects such as displacement, collision risk, and habitat loss, despite the fact that these seabird species are known to rely on key foraging areas and migratory pathways.

There exists a stark contradiction within the application itself. The developer asserts that there will be no significant adverse effects, yet simultaneously puts forth a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and raises serious doubts about the sufficiency of the evidence presented. Furthermore, the assessment does not adequately demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance

of these vital feeding grounds is not fully recognised, and the methodologies used, which rely on modelling approaches, introduce uncertainty, particularly for species like Kittiwakes and Fulmars that are already experiencing severe population declines.

The implications of sustained mortality within this migratory corridor are not sufficiently addressed, nor are the potential consequences for species with relatively small global populations. From a regulatory standpoint, the application falls short of the evidential threshold needed to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and methodological limitations, means that the standard of beyond reasonable scientific doubt has not been met, thus engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

Moreover, these deficiencies represent a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that these internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the proposed impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

Concerns also arise regarding community rights and engagement. The Gaelic-speaking

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This lack of transparency undermines the Environmental Impact Assessment process. Understanding social, economic, and health impacts is critical for developments of this

magnitude, especially when they may affect community character and functionality. By withholding the complete dataset, the application does not provide a thorough evidential basis for evaluating the balance of benefits and harms.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its undeveloped nature, open Atlantic horizon, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, significantly altering this unique character and leading to a permanent transformation of the landscape. The application fails to adequately reflect the magnitude of this visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and compromising the naturalness and remoteness that define the area.

Moreover, there are significant methodological issues regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This suggests that the visual impact may be underestimated, which calls into question the reliability of the assessment.

Another critical deficiency is the lack of consideration for the interconnected relationships between seascape, landscape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape framework, intricately linked by visual and spatial relationships to the Atlantic horizon. The assessment incorrectly treats these assets as isolated, failing to acknowledge their interdependence and resulting in an incomplete evaluation of the

impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their connection to the natural horizon. This leads to not only a visual impact but also broader cultural and spatial harm that has not been thoroughly assessed in 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 is incompatible with the necessity to protect 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 policy compliance.

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

Collectively, the assessment does not accurately represent the scale of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is fundamentally lacking, failing to provide the necessary detail to evaluate the potential environmental impacts adequately. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that would only be developed after consent, which precludes any thorough evaluation of their effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not offer adequate detail on how these issues will be prevented, controlled, or monitored.

Additionally, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also

pertains 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 issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether suitable safeguards are in place to respond to pollution incidents. This approach introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant likely effects and mitigations must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life provided within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The waters adjacent to 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 habitats and uses can be safeguarded or maintained without significant disruption.

A notable concern is the assertion that fishing activities can be displaced without adverse consequences. The application does not present evidence that alternative fishing grounds are available, accessible, or capable of accommodating any additional pressure that might arise from this displacement. This oversight is critical, as such displacements pose the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is expected to disturb marine life across wide areas, with notable impacts on species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing sufficient supporting evidence.

Furthermore, there is a striking inconsistency within the application. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

The assessment also neglects to address cumulative impacts that result from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for understanding 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 illustrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusions about the proposal's sustainability.

In conclusion, the deficiencies noted—including the lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal contradictions—render the assessment incomplete and unreliable. These shortcomings prevent a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure associated with this project is fundamentally flawed and fails to capture the full range of impacts from what constitutes a single, integrated initiative. The offshore turbines are closely linked to the onshore works, yet these elements are assessed in isolation. This disjointed analysis obscures the true scale of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the creation of access routes through sensitive landscapes. Significant excavation across deep peat areas, especially within Barvas Moor, which serves as an important carbon store and ecologically fragile habitat, is also part of these works. The lack of a thorough assessment of these impacts hinders a comprehensive understanding of the project's overall environmental footprint.

The omission of onshore impact assessments prevents an accurate evaluation of cumulative effects. According to the Environmental Impact Assessment process, all elements of a project should be examined collectively. However, the distinct separation of offshore and onshore aspects leads to a lack of clarity regarding 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 safeguarded by policy. The proposal does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance strategies have been implemented, resulting in a clear evidential void concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application fails to provide proof that the requisite consents or processes are underway, which calls into question the feasibility and lawful execution of the project.

From a policy standpoint, the lack of a holistic assessment of the project and the failure to show protection for peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to confirm that impacts can be avoided or mitigated further weakens the application.

In summary, the fragmented assessment of project components, the absence of a comprehensive evaluation, and the lack of evidence regarding environmental and land use impacts render this section of the application incomplete and untrustworthy, ultimately obstructing 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 shaping the area's cultural identity, environmental quality, and tourism potential. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating an intrusive and continuous "wall of light" effect across the western horizon. This alteration would significantly disrupt the night-time environment, yet the application fails to assess the implications of such lighting on visual amenity, landscape character, or the experiences of local residents and visitors.

The absence of an evaluation of impacts on nocturnal wildlife is particularly concerning. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The proposal does not include a lighting impact assessment or a study on phototaxis, neglecting to consider how the introduction of aviation lighting may affect these vulnerable species or lead to increased mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture the nocturnal activities and associated risks faced by species such as Kittiwakes, known to forage or migrate at night. This lack of site-specific night-time data presents a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of the nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific

doubt is not met, necessitating the application of the precautionary principle and thereby precluding a lawful determination.

From a policy standpoint, these omissions contradict National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. Additionally, they undermine a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is an essential component of the overall ecology.

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

TOURISM

The application inadequately assesses the potential impacts on tourism, which is a vital component of the Isle of Lewis economy. Tourism is deeply rooted in the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted to the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the economic contribution of tourism.

This sector has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and subsequent loss of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an essential and expanding sector.

Furthermore, the significance of environmental quality in promoting tourism is neglected. The unspoiled landscapes and dark skies are crucial for enhancing visitor experiences and for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and burgeoning part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent to the area have not been adequately addressed, contrary to the requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the

National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It also runs counter to strategic objectives that prioritise tourism as a growth sector, failing to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This shortfall hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is lacking.

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.

Additional Comments

I grew up coming to the Westside of Lewis to stay for holidays with my Father's family. (My Mother is also from the island but from the East coast, lochs area, where we also stayed.)

My memories of these holidays take me back to peat cutting in the sun, hay-making on the croft overlooking the Atlantic, long walks along the beautiful coastline with my family and playing on the stunning, pristine beaches with my cousins for hours on end.

It hurts deeply and betrays all islanders that all these memories, that I know so many families will have had for many many years, will be tarnished so brutally and the population of the whole island both human and natural, land and sea will be utterly violated with one signature, not even coming close to compensating the people and natural habitat of our island and the ocean surrounding it. All for money that the island will barely see.

Years after these fondly remembered and idyllic holidays, I now live here, moving up when my parents retired to the croft. This is my fourteenth year living here where I now work and my roots are firmly on the island. I hope I will live here for as long as is humanly possible. I can't think of a more grounding, joyful and healthy place to live, both for nature and community reasons as well as so many other reasons.

Almost thirty years ago, I was diagnosed with schizophrenia and my whole outlook and source of strength, courage and fight against this debilitating disease has come from living on this island - the kindness of the people and looking out at the sea and the beautiful natural world surrounding me every day. My parents house looks out over the Atlantic in Brue, on the Westside and the thought of every day looking out -and my

parents and neighbours looking out - and no longer having the beautiful view we have so long gazed at - that our ancestors also gazed at whilst crofting, weaving and fishing for centuries absolutely breaks my heart.

It is a community which rarely kicks up a fuss or complains, just getting on with their lives and welcoming visitors warmly without hesitation. But this is a situation where our voice must be heard and cannot be ignored. We deserve to be taken seriously in this situation. Put quite simply, it is our right. Please hear our voice. Please, please hear our voice.

.

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: 0AABFA3E

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

Dear Sir/Madam

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

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

There are significant and clear conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests required for consent and impair the competent authority's ability to determine the proposal's acceptability within policy frameworks.

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

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the submission provides a narrative on project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has adequately considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the failure to include such an analysis precludes any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence indicating that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis highlight that the principle of mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, which hampers the ability of the competent authority to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be confidently stated that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, these deficiencies significantly undermine adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a critical omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species contains significant deficiencies that hinder a complete understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system. However, the baseline data provided is inadequate, and the methodologies used fail to effectively capture the presence, behaviour, and habitat use

of various species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A notable gap exists concerning 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 oversight of their core foraging range and behavioural patterns raises concerns about the assessment of potential effects from construction disturbances, noise, and increased activity. This limitation undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks. The reliance on aerial surveys introduces a significant bias in detection, especially under Atlantic conditions, which may lead to an underestimation of their presence. This is particularly concerning when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or accurately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings suggest that conclusions regarding negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of comprehensive baseline data also restricts the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty complicates the understanding of the actual risks faced by marine species and 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 uncertainty created by these deficiencies precludes the possibility of excluding adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Given these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a designated migratory corridor on the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately demonstrate, to the required evidential standard, that these species will not be adversely affected. It fails to robustly evaluate critical factors such as displacement, collision risk, or habitat loss associated with the proposed

development, particularly given its location within key foraging areas and migratory pathways.

A fundamental contradiction is evident in the application. While the developer claims there will be no significant adverse effects, it simultaneously puts forth a Habitats Regulations derogation case, which is necessitated only in scenarios where significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that its conclusions lack proper support from the underlying evidence. The assessment inadequately addresses the potential effects on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling approaches introduces a layer of uncertainty, particularly for species that are already experiencing severe declines, like Kittiwakes and Fulmars. Consequently, the methodologies used may underestimate mortality rates, especially in light of incomplete baseline data and a lack of understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor introduces significant risks, effectively obstructing a primary flight path that species utilise when travelling between the United Kingdom and Iceland. The assessment does not sufficiently analyse the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. Regulatory concerns arise from the application's failure to meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the assessment has not satisfied the standard of beyond reasonable scientific doubt. This scenario invokes the precautionary principle, which hampers the ability to reach a lawful conclusion in favour of granting consent.

The identified deficiencies also suggest a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. Collectively, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. Such flaws hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a positive determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is inadequate. It fails to recognise this area as a living cultural landscape, where environment, language, tradition, and community are interconnected. The application treats heritage merely as static assets, rather than acknowledging their active social, cultural, and spiritual functions within the community.

A significant issue is the handling of culturally important sites, such as the cemeteries

at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice, yet they are regarded as static features in the assessment. This oversight neglects their ongoing use, significance, and the potential impact of development on their surroundings, leading to an incomplete evaluation of cultural effects and overlooking their role in community life.

Moreover, the application does not assess intangible cultural heritage, such as the Gaelic language and traditions, as well as the long-standing connection between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely excluded from the assessment, which is a notable omission. The cultural impact of the development cannot be properly understood without considering these factors.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

A critical failure in procedure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission prevents a lawful determination.

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant gap in evidence. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The addition of large-scale turbines situated near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the assessment does not sufficiently convey the extent of this visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and commonly visited coastal locations. Consequently, this would have a direct negative effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation fails to adequately express this level of impact or its significance within the context of such a sensitive landscape.

Concerns regarding methodology arise from the selection and presentation of visual viewpoints. Evidence indicates that certain viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been understated, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. By treating these assets in isolation, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the experience of heritage assets and severing their connection to the natural horizon. This represents not only a visual impact but also a wider cultural and spatial detriment that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The degree of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents an incomplete assessment of construction and pollution risks, lacking the necessary detail to adequately evaluate potential environmental effects. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures to be formulated after consent is granted, which obstructs any meaningful appraisal of their sufficiency or efficacy.

This dependence on unspecified future measures raises particular concerns due to the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application identifies risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on the preventive, control, or monitoring strategies that will be implemented.

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

The lack of specific emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application hinders the ability to evaluate whether appropriate safeguards are available for responding to pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures prior to the decision-making process.

From a regulatory standpoint, the postponement of vital environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Prior to granting consent, it is imperative that likely significant effects and associated mitigation strategies be thoroughly assessed; the absence of such critical information renders lawful determination impossible. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the lack of established mitigation measures, insufficient detailed management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies preclude a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment fails to provide a strong evaluation of the ecological or socio-economic impacts on fisheries and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not prove that these uses and habitats can be protected or maintained without serious disruption.

A significant concern is the assumption that fishing activities can be moved without any consequences. The application lacks evidence that alternative fishing grounds are available, accessible, or able to handle additional pressure. This lack of information is crucial, as displacement could lead to overfishing in other areas and might have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, it is impossible to understand the impacts on fisheries and local livelihoods.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise produced during construction. High-energy hammer piling over an extended duration is expected to cause disturbances over large areas, affecting species such as dolphins. The predicted disturbance to a significant part of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Moreover, there is an inconsistency in the application regarding the necessity for licences to allow harm to European Protected Species, while simultaneously describing impacts as negligible. This contradiction undermines the assessment's credibility and raises issues concerning compliance with the Habitats Regulations, especially where harm is expected to a level that requires legal approval.

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

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

In summary, the inadequacies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions make the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the effects on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The coastline of West Lewis is

known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

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 important given the relevance of dark skies to the area's identity and the growth of sectors such as astro-tourism. The lack of consideration for these impacts highlights a major deficiency in the overall landscape and environmental assessment.

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, leaving a crucial gap in understanding how aviation lighting might impact these species and their mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates the issue, as it does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The lack of specific night-time data is a critical oversight in understanding ecological impacts.

Without assessing nocturnal impacts, it cannot be determined whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful decision.

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

In summary, the lack of an assessment of 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 unsuitable for a lawful determination.

TOURISM

The tourism sector of the Isle of Lewis has experienced substantial growth, with its economic contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the current application lacks a thorough assessment of how proposed large-scale offshore infrastructure could impact visitor numbers, behaviours, and the overall economic contribution of tourism, despite acknowledging that 86% of visitors are

attracted by the area's scenic beauty. This absence of a quantified analysis raises significant concerns regarding whether the development may yield a net economic benefit or potentially undermine a crucial and expanding sector.

Furthermore, the assessment inadequately addresses the vital relationship between environmental quality and tourism, neglecting to evaluate how the preservation of unspoiled landscapes and dark skies enhances the visitor experience. The lack of a Dark Skies Assessment exacerbates this oversight, highlighting a substantial gap in understanding the implications for emerging markets such as nature-based tourism and astro-tourism.

The implications of not assessing tourism impacts extend beyond the sector itself, affecting local employment, businesses, and the sustainability of the community, particularly within an island context that exhibits limited economic diversification. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as mandated under the Islands (Scotland) Act 2018, have not been properly evaluated. From a policy standpoint, the application fails to adhere to the principles outlined in the National Planning Framework 4, especially concerning the necessity of demonstrating a net benefit and aligning with strategic objectives that prioritise tourism as a growth sector. This inadequacy further hampers the competent authority's ability to thoroughly assess the economic consequences of the proposal.

In conclusion, the deficiencies in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This gap hinders a comprehensive evaluation of the economic effects and suggests 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 it does not align with statutory duties, national policy, or evidential standards. This application echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a thorough and reliable evidential basis.

Critical gaps in baseline data are evident, alongside the continued use of an undefined design envelope and an overreliance on unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects and residual impacts.

There are also clear procedural failures associated with the proposal. The absence of a

compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the lack of a full Social Impact Assessment represents a material omission. These deficiencies impede the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent, and the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, preventing a lawful conclusion that impacts are acceptable.

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

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

For these reasons, a formal request is made that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AEE46CE7

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, the proposed development exists in an area characterised by its Atlantic-facing coastline, near-pristine natural environment, and a strong cultural identity.

The application lacks a solid evidential foundation necessary for lawful determination. There are critical gaps in environmental data, while the baseline information presented is both limited and inconsistent, leaving many key elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the mitigation measures suggested remain unspecified, rendering their effectiveness unassessable. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Moreover, the proposal presents clear and substantive conflicts with policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests needed for consent and undermine the authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and unfit for lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking and does not give a complete, clear, or trustworthy overview of the potential environmental effects of the proposal. The flexible Project Design Envelope used does not commit to specific turbine

dimensions, layouts, or configurations. This creates significant uncertainty and hinders the ability to consistently apply a worst-case scenario. As a result, the assessment's integrity is compromised, meaning that the impacts described may not accurately reflect the final development. This prevents both the public and the competent authority from fully understanding the environmental effects.

The application relies on mitigation measures, monitoring strategies, and management plans that have not been defined yet. Seeking consent under these conditions means that any environmental harm will supposedly be addressed later, which undermines a proper evaluation of effectiveness and assessment of residual impacts. This postponement of essential information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime. This regime requires that significant effects and mitigation measures are clearly identified before a decision is made.

There are also major evidential gaps, including insufficient baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to 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 means that cumulative and worst-case impacts are not clearly understood, resulting in scientific uncertainty that does not meet statutory requirements.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not show compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity. It has not been demonstrated that the 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, and the gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough evaluation of environmental effects, meaning the competent authority cannot make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposal under consideration lacks a comprehensive assessment of marine ecology and protected species, which is essential for understanding the ecological receptors within the West Lewis coastal environment. This region is recognised as a highly sensitive and biologically active marine system. However, the data available is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of various species. Consequently, the assessment does not provide a reliable evidential basis for evaluating potential impacts.

Notably, the assessment fails to properly identify and assess otters, which are a European Protected Species. There is insufficient recognition of their active use of coastal areas for foraging and movement, and the core foraging range and behavioural patterns of otters have not been adequately considered. This lack of detail means that the potential impacts of construction disturbance, noise, and increased activity on otters have not been thoroughly assessed, undermining any conclusions about the absence of significant effects on this species.

Additionally, there are substantial deficiencies in the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such relevant data results in an incomplete baseline and weakens the reliability of the conclusions drawn.

The methodological limitations present mean that conclusions suggesting negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been a failure to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the conclusion that adverse effects can be excluded beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 application is significantly flawed, with considerable gaps in evidence and internal inconsistencies undermining its conclusions. Notably, the application fails to demonstrate to the required evidential standard that these species will not be adversely affected. It is situated within key foraging areas and migratory pathways; however, the implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

A fundamental contradiction arises in the application where the developer concludes that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which should only be necessary where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and indicates that the conclusions drawn are not adequately supported by the underlying evidence. The assessment lacks sufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces further uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in areas where baseline data is lacking and behavioural responses remain poorly understood.

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

From a regulatory standpoint, the application does not meet the necessary evidential threshold 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, preventing a lawful conclusion in favour of consent. The deficiencies outlined also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and inadequate evidence. These deficiencies obstruct a thorough evaluation of impacts and lead to the overarching conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts a simplistic viewpoint, perceiving heritage merely as a collection of static, isolated assets without recognising their ongoing social, cultural, and spiritual relevance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active

burial places and centres of spiritual practice, yet they are erroneously classified as static features. This oversight neglects their current use, significance, and the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete assessment of cultural effects, disregarding their importance within community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, leading to a substantial gap in understanding the cultural ramifications of the development.

Concerns are further compounded by issues relating to community rights and participation. The Gaelic-speaking population embodies a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Additionally, a crucial procedural error is the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to appraise the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful decision-making process.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, alongside failing to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the inadequacies in assessing living heritage, intangible cultural significance, community rights, and statutory requirements culminate in a substantial evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a robust foundation for gauging 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 West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposal for large-scale turbines near the shoreline poses significant concerns as it would result in a continuous industrial presence, fundamentally transforming the landscape in a permanent and irreversible manner.

The application fails to adequately assess the scale of the visual changes that would occur. The proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, which would adversely affect

visual amenity and compromise the defining qualities of naturalness and remoteness. The current assessment does not effectively capture the extent of this impact or its significance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints within the assessment. It appears that the viewpoints chosen may not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and landscapes of high value. This raises concerns that the visual impacts may have been understated, thus diminishing the reliability of the overall assessment.

Moreover, the application overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are linked to their wider landscape context through visual and spatial relationships with the Atlantic horizon. The assessment inadequately considers these connections, treating these assets as isolated entities, which results in an incomplete evaluation of their cultural significance and setting.

The introduction of industrial elements into the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This transformation constitutes not only a visual detriment but also a broader cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The proposed scale of change is at odds with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertion of compliance with policy requirements.

It is evident that the impacts associated with this proposal are unlikely to be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be imposing and unavoidable. Consequently, the resulting changes would be fundamental and permanent, rather than amenable to acceptable levels of reduction through mitigation.

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

FISHERIES AND MARINE LIFE

The proposal's assessment of marine life and fisheries is fundamentally inadequate, failing to provide a thorough examination of both ecological and socio-economic

implications. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the application does not adequately ensure that these vital habitats and activities will remain protected and maintained without considerable disruption.

A notable concern is the unsubstantiated assumption that fishing activities can be displaced without repercussions. There is a lack of evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate any increased pressure from displaced fishing. This absence of information is critical, as such displacement could lead to overfishing in other areas and may result in broader economic ramifications for the local fishing fleet. Without a detailed and evidence-based evaluation, the implications for fisheries and local livelihoods are not fully understood.

Moreover, the proposal poses significant threats to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is anticipated to cause disturbance across considerable distances, impacting species including dolphins. The forecasted disturbance to a substantial portion of the local bottlenose dolphin population raises alarming concerns, yet the application minimizes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, as it acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction diminishes the credibility of the assessment and raises alarms regarding adherence to the Habitats Regulations, especially when harm is expected to an extent that warrants legal authorization.

The assessment also neglects to account for cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough assessment of these interconnected effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

From a policy standpoint, the application does not illustrate conformity 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 evade unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal is sustainable.

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 shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application raises substantial concerns regarding the integrity of its assessment, particularly in relation to the onshore infrastructure, which remains materially incomplete. This approach treats the offshore turbines and onshore works as separate entities, which obscures the full scope of the environmental and socio-economic effects associated with what is fundamentally a single integrated project.

One of the critical components of the onshore works involves the routing of cabling across protected moorland and the construction of a substation in proximity to Stornoway. This activity necessitates excavation across areas rich in deep peat, notably within Barvas Moor, an ecologically sensitive habitat that serves as a significant carbon store. However, the application fails to provide a thorough assessment of these impacts, thereby inhibiting a complete understanding of the project's environmental footprint.

The omission or postponement of onshore impact assessments results in an inability to accurately evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be assessed together; yet, the current separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are notable risks posed to sensitive habitats, including machair systems and peatland environments, which receive policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been implemented. This deficiency signifies a significant evidential gap in terms of biodiversity protection.

The proposal also raises important issues related to carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially creating a carbon debt that contradicts the fundamental goals of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises doubts about the project's deliverability and lawful implementation.

From a policy perspective, the failure to assess the project comprehensively and to demonstrate protection for 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 compromises the integrity of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

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 important as dark skies are integral to the area’s identity and to emerging sectors like astro-tourism. The omission results in a significant gap in the landscape and environmental assessment.

More importantly, there is no analysis of how the proposal would impact nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, which can disorient them and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, leading to a failure to determine how aviation lighting may affect these species or contribute to increased mortality rates.

The use of daytime survey data in the ornithological assessment further complicates the situation, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without a proper evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

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

In conclusion, the lack of any assessment concerning dark skies and nocturnal wildlife represents 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 within the application is insufficient, neglecting the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantitative assessment provided regarding how large-scale offshore infrastructure might influence visitor numbers, their behaviours, or the broader economic contributions they make.

The significance of tourism on the island is highlighted by its growth from £65 million in 2017 to over £81.5 million, with more than 1,000 jobs supported and tourism accounting for up to 16% of the economy. However, the application fails to examine how the potential industrialisation of the seascape and the degradation of environmental quality would affect Tourism Gross Value Added or the overall economic resilience of the area. Without this critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or instead compromise a crucial and flourishing sector.

Moreover, the importance of environmental quality in promoting tourism has not been addressed, particularly regarding how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this inadequacy, creating a notable deficiency in understanding the impacts on this recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the neglect of tourism impact assessments raises broader concerns 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 mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefits. It also runs counter to strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to adequately assess the economic ramifications of the proposal.

Collectively, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic reliance leads to a significant evidential gap. This gap hinders 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 fails to meet the requirements of sustainable development, as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues of the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale

of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for the determination of this application. The reliance on an undefined design envelope, unspecified mitigation measures, and the absence of key impact pathways, including nocturnal wildlife and full onshore infrastructure effects, render the Environmental Impact Assessment incomplete. Consequently, this lack of comprehensive data hampers the ability to fully understand the likely significant effects or residual impacts.

Moreover, there are procedural shortcomings that must be addressed. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty under the Islands (Scotland) Act 2018. Additionally, the incomplete Social Impact Assessment represents a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience.

The proposal is inconsistent with National Planning Framework 4, which calls for the protection of biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that the health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The failure to properly assess the cumulative impact of both offshore and onshore elements obscures important effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals contain inconsistencies that fail to meet the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

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

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, 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

As a resident of the Highlands, and someone who has visited the Western Isles regularly, I am appalled at yet another highly inappropriate proposal to destroy our

landscape, the quality of life of fragile communities, with no realistic benefit to that community.

Green energy developments should be through community based, developed, and agreed projects such as at Kinlochbervie.

Stop paying these corporations to turn their installations off, and refuse to give permission, or taxpayers money, to create more infrastructure totally inappropriate to its site.

Show some respect for the community, its heritage, and the natural world it treasures and we love and visit.

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: 78EA5BC5

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. The basis for this objection stems from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key components of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

There are evident and substantial policy conflicts inherent in the application. 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 proposal does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and weaken the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines positioned near the shoreline, raising 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 illustrates that the application is incomplete and unfit to support a lawful determination. Given these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in essential information and does not offer a complete, clear, or trustworthy account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This approach hinders a consistent worst-case scenario analysis, compromising the assessment's integrity and obscuring the true environmental effects from both the public and the competent authority.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought under the premise that environmental damage will be addressed later, which hinders meaningful evaluation of effectiveness or the assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies be clearly established before any determination.

There are notable evidential shortcomings, including gaps in 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 conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential requirements under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This brings the precautionary principle into play, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the dependence on an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data lead to an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings prevent a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental effects, it merely outlines the project's development history. This lack of analysis does not show that less harmful options have been properly identified and assessed in preference to more damaging solutions.

There is no clear or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has given serious consideration to placing turbines further offshore, where visual, ecological, and coastal impacts would probably be lessened. The sensitivity of the West Lewis coastline makes proximity to shore crucial in assessing impact. The lack of such analysis means that it cannot be concluded that the proposed siting is the least damaging option.

This inadequacy also applies to cable routing and landfall assessment. There is insufficient evidence that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, along with the lack of comparative analysis, suggests that design-based mitigation has not been implemented, leading instead to reliance on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally deficient, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This marine system is recognised for its biological sensitivity and activity; however, the incomplete baseline data and inadequate methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential basis to evaluate potential impacts.

One significant oversight is the treatment of otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active utilisation of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been sufficiently evaluated. As a result, any conclusions drawn about the absence of significant effects on otters are fundamentally undermined.

Additionally, there are notable deficiencies in the assessment of basking sharks, which are exacerbated by reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underreport the species' presence, especially when compared to established land-based observations that demonstrate frequent use of these waters. The failure to properly incorporate or consider such data contributes to an incomplete baseline, further weakening the reliability of the conclusions drawn.

The limitations of the methodologies employed result in conclusions regarding negligible or non-significant effects being derived from assumptions rather than robust evidence. Moreover, the absence of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species have not been conducted, creating a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these circumstances, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, exhibiting substantial gaps in evidence and inconsistencies that undermine its conclusions. Key foraging areas and migratory pathways, particularly along the west coast of the Isle of Lewis, support internationally important seabird populations, many of which are already experiencing declines. However, the application fails to demonstrate, to the necessary evidential standard, that these species will not be adversely affected by the development. The implications of displacement, collision risk, and habitat loss have not been robustly evaluated.

There exists a significant contradiction within the application. The developer concludes that there are no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Moreover, the assessment does not sufficiently demonstrate that seabirds associated

with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately considered, and reliance on modelling approaches introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, particularly given the incomplete baseline data and a lack of comprehensive understanding of behavioural responses.

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

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion that would support consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development on the West Lewis coastline lacks a thorough assessment of cultural heritage and community identity, failing to recognise the area as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The approach taken in the application reduces heritage to mere static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant oversight is evident in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice, yet they are categorised as static features in the assessment, which disregards their continued use, significance, and the impact of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and dismisses their importance in community life.

Additionally, the assessment neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity but are conspicuously missing from the analysis, marking a considerable omission. This lack of consideration hinders a comprehensive understanding of the cultural impact of the development.

There are also critical concerns related to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as an Indigenous People, yet there has been no implementation of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the credibility of the assessment and does not adhere to established participatory principles regarding decisions that affect cultural and environmental interests.

A major procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to prevent a lawful determination.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to acknowledge both tangible and intangible heritage, along with the neglect of living cultural practices, constitutes a clear violation of policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory requirements results in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal poses a potential threat to community identity and cohesion, as indicated by the developer's own findings which highlight "cultural loss." Despite this significant concern, the impacts have not been adequately incorporated into the main application or given the necessary consideration. The failure to disclose the full Social Impact Assessment obscures the true human and social cost associated with the development, creating an evidential gap that hinders public and authoritative understanding of the associated social risks.

Moreover, residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as revealed through direct engagement. These impacts are concrete rather than speculative, yet the non-disclosure of the complete assessment restricts proper scrutiny of the findings and limits the ability to ascertain their significance in the decision-making process. The assessment of social impacts, health, and wellbeing is deficient, lacking the

transparency essential for a lawful evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm. However, the available evidence points to existing adverse effects that have not been fully addressed. Without the complete assessment, it is impossible to establish compliance with this policy.

The implications of this lack of transparency are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a significant omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

Ultimately, the combination of withheld information concerning the full Social Impact Assessment and the evidence of existing adverse impacts renders the overall assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment related to seascape, landscape, and visual impacts is insufficient and does not capture the true scale of change or the vulnerability of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a persistent industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application inadequately conveys the extent of this visual alteration. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal spots. This would negatively affect visual amenity and detract from the essential qualities of naturalness and remoteness. The assessment does not accurately depict this level of impact or its significance within such a delicate landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence that these viewpoints do not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This creates a risk that the visual impact's magnitude has been downplayed, compromising the assessment's reliability.

Another shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting linked by visual and spatial relationships to the Atlantic horizon. The

assessment treats these sites as separate entities, failing to acknowledge their interdependence and resulting in an incomplete analysis of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, affecting the context in which heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact but also a wider cultural and spatial harm that the application has not adequately considered.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, the assessment of construction and pollution risks lacks the necessary detail to evaluate likely environmental effects adequately. Notably, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans presented. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the strategies for prevention, control, or monitoring of these risks.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it becomes 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, which have already

been identified as sensitive within the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application restricts the evaluation of whether adequate safeguards exist to address pollution events. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are assessed prior to consent, and the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of marine life and fisheries. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these vital habitats and uses can be safeguarded from disruption.

A major flaw in the application is the assumption that fishing activities can be shifted without negative consequences. There is no evidence presented that alternative fishing grounds exist or that they can support the pressure from displaced activities. This is a crucial gap, as such displacement may lead to overfishing in other areas, potentially impacting the local fishing fleet's economic viability. Without a thorough assessment based on evidence, understanding the implications for fisheries and local livelihoods remains incomplete.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise from construction activities. The use of high-energy hammer piling for an extended period is likely to disturb marine life over considerable distances, which could affect species like dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is concerning, yet the application appears to minimise these effects without adequate supporting evidence.

There is also a troubling inconsistency within the application. While it acknowledges the need for licenses to allow harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction questions the credibility of the

assessment and raises compliance issues with the Habitats Regulations, especially in cases where harm necessitates legal approval.

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

In terms of policy compliance, the application does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the presence of internal inconsistencies render the assessment incomplete and unreliable. These issues hinder any robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application does not provide evidence that the necessary consents or processes for routing infrastructure through active croft land have been initiated, which raises significant questions about deliverability and lawful implementation. This issue highlights the potential for conflicts with existing land use and legal rights, further complicating the project's viability.

The assessment of onshore infrastructure remains materially incomplete, failing to consider the full extent of impacts arising from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked yet assessed separately, leading to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

There are significant risks posed to sensitive habitats, including machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied, creating a clear evidential gap in relation to biodiversity protection.

Concerns regarding carbon balance are also prominent in this proposal. Disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application fails to adequately address this issue or to demonstrate that the overall carbon balance remains beneficial.

By excluding or deferring the assessment of onshore impacts, the application undermines the ability to evaluate cumulative effects properly. The Environmental Impact Assessment process mandates that all components of a project be considered

together; however, the separation of offshore and onshore elements results in a failure to fully understand the combined impacts on peatlands, habitats, and communities.

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

Ultimately, the separation of project components, the absence of comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, hindering a lawful determination. The need for immediate action in addressing these critical issues cannot be overstated.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of any assessment regarding nocturnal wildlife and dark skies represents a significant oversight in the Environmental Impact Assessment. The dark skies along the West Lewis coastline are crucial to the area's cultural identity, environmental quality, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over long distances, threatens to create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the consequences of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning as dark skies play a vital role in attracting emerging tourism sectors, such as astro-tourism. The omission of these critical impacts results in a substantial gap in the overall assessment of landscape and environmental factors.

Equally important is the lack of evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial light, which can disorient them and increase their risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, failing to address how aviation lighting could affect these species or contribute to increased mortality rates.

Additionally, reliance on daytime survey data in the ornithological assessment misses the nocturnal activities of species like Kittiwakes, which may forage or migrate at night and are equally at risk of disorientation from artificial lighting. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts involved.

Without a thorough assessment of the effects on nocturnal wildlife, it is impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and

hindering a lawful determination.

From a policy standpoint, these omissions clash with the National Planning Framework 4, which seeks to protect natural places and environmental quality. This oversight undermines the overall evaluation of landscape and seascape impacts, as the character of night-time forms an essential aspect of the environment.

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

TOURISM

The evaluation of tourism impacts associated with the proposed development is severely inadequate, failing to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism sector is intrinsically linked to the area's wild coastline, nearly untouched landscapes, dark skies, and an overarching sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantifiable analysis of how the introduction of large-scale offshore infrastructure could influence visitor numbers, their behaviour, or the overall economic contributions of this sector.

Tourism has experienced substantial growth, with its contribution rising from £65 million in 2017 to over £81.5 million, thus supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. This lack of analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an already flourishing sector.

Additionally, the assessment overlooks the significance of environmental quality in bolstering tourism, particularly regarding the value of unspoiled landscapes and dark skies to visitor satisfaction, as well as to emergent markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortfall, resulting in a considerable gap in understanding the impacts on a recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the oversight in assessing tourism impacts bears broader consequences for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment has resulted in the failure to evaluate these economic vulnerabilities as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4, specifically regarding 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 implications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing environmental drivers of visitor behaviour, and considering the island's economic dependencies culminate in a substantial evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the determination that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential standards. This application revisits the central concerns that resulted in the denial of the Lewis Wind Power proposal in 2008, which was deemed excessively industrialised. Presenting the application now under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not adequately address these issues.

Critical deficiencies exist in the evidential basis for the proposal. The baseline data is incomplete, there is continued reliance on an unspecified design envelope, mitigation measures are vague, and essential impact pathways, including effects on nocturnal wildlife, the full extent of onshore infrastructure, and tourism impacts, have not been thoroughly examined. Consequently, the Environmental Impact Assessment is deficient, failing to provide a comprehensive understanding of the significant effects or residual impacts that may arise.

The application also exhibits notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a clear violation of statutory duties under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment constitutes a significant omission, hindering the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience. These failures collectively render the application unsuitable for determination.

Furthermore, the proposal is at odds with the National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural environments, and cultural heritage. There is a failure to show that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling precludes any evidence of net economic benefit. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain ambiguous and potentially serious. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally contradictory. The

evidential burden necessary to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, necessitating the application of the precautionary principle and precluding a lawful determination that impacts are acceptable.

Additionally, this proposal would induce 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 connections, and the effects on tourism constitute permanent impacts that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct the ability to make a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or invoke relevant regulatory provisions to require the submission of the necessary missing information.

In light of these issues, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

This proposed windfarm, if approved, will dramatically alter the most beautiful and unspoilt area of the British Isles for the worse, with absolutely ZERO benefit for the residents of the island - how could anyone possibly be in favour of it?

Here are just some of the reasons I wish to object to this abomination in the strongest possible terms -

Environmental impact - this is an enormous building project in what has been, until now, a quiet and unspoiled area of the Atlantic. Vastly increased marine traffic and undersea construction will have untold negative effects on a delicate ecosystem - Northland will no doubt claim that this can be mitigated but they have no way to prove this. The reality of construction projects is things go wrong and corners are cut - what is going to be dumped into the sea away from any oversight and what is going to be covered up? During the seismic survey for this project, there have already been mishaps including a large drill bit being lost in the sea bed. Construction, if approved, will not go smoothly.

Assessment of alternatives - the consensus amongst energy experts is that nuclear is the way forward. I would far sooner have a nuclear plant on the island than this awful plan go ahead. Where have Northland offered alternatives to their plan that is effectively “two fingers up to the Hebrideans, what are they going to do?”

Ornithology and seabird impacts - again, Northland will claim, thanks to the small number of aerial surveillance flights they’ve contracted “BioFlight” for, that this has been taken into account - rubbish. It is at best, a snapshot, and at worst, like almost all their claimed mitigation, an absolute token gesture.

Cultural heritage, community identity - the cynical use of the Gaelic language to name this rapacious commercial enterprise is sickeningly patronising. How dare they? Not a single person I've spoken to in this community wants Northland anywhere near the island.

Social impact, health, wellbeing - the inevitable influx of workers will have a negative impact on the island. Accommodation is already at a premium - having more of it taken up by itinerant construction workers further squeezes out already marginalised locals and will drive prices up.

The local NHS is also not designed for or capable of handling the increased demands that would be placed on it.

Locals and tourists love coming to the Western Isles to relax, unwind and recharge - it's an unspoilt and rugged stunning natural wilderness. How do Northland think enormous ongoing construction will affect that initially, and how do they think having some of the largest wind turbines in the world positioned there will affect the natural beauty that people love so much. Do they care? No.

Seascape, Landscape, Visual Impact - all you need to do is look at their self-generated simulated images. It is outrageous how intrusive these things are - they RUIN the view of the entire west side of the island.

Fisheries and Marine life - there are a number of fishing boats that regularly operate in the Atlantic West of Lewis. If this proposal goes ahead as planned - where do they go? Has their livelihood been taken into account by Northland? The answer again - they couldn't care less.

Same for recreational boaters and fishermen, of which I am one - what has been a brilliant area to fish and enjoy the stunning natural beauty and wildlife of the Western Isles, unchanged for thousands of years, will be totally and utterly ruined by this appalling proposed abomination.

Onshore infrastructure - there has already been at least one piece of significant onshore infrastructure constructed on the Barvas machair, with no regard for due procedure. A 500' anemometer mast has been put there, without informing the Civil Aviation Authority or issuing a Notice to Airmen - both of which are required to be done for a structure like this which is a significant danger to aviation. If this is how the entities planning this project behave before they even have planning permission, does anybody really believe more corners will not be cut if this gets green lit?

Dark skies - the Hebrides are recognised as one of the best dark sky sites in Europe. If some faceless corporation in Canada can make a fortune by completely obliterating that though, shouldn't we all get on board?

Tourism - what were once gorgeous sea views on the west of the island and desert islands which are genuine paradises will become unsightly, commercial, man-made, industrial wastelands.

Other impacts - as a search and rescue helicopter pilot, enormous areas of the sea filled with huge wind turbines mean we cannot access areas of the sea that we could otherwise, and means that at times, depending on how close these things are built to the shore, means we could struggle to reach parts of the coast in poor weather - genuinely putting lives at risk. But hey, if some awful corporation can make a few bucks - does that really matter?

Please, for the sake of this island, do not let this project go ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: FB2C7E73

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 marine licensing and Environmental Impact Assessment regimes. An analysis of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, largely untouched environment, and robust cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential foundation necessary for a lawful decision. There are substantial gaps in critical environmental data, and the available baseline information is both limited and inconsistent. Additionally, several key components of the proposal remain undefined. The employment of a flexible design framework hinders a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation fails to facilitate a complete understanding of the environmental, cultural, or community impacts, while claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantial policy conflicts are evident in this case. 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 does not adequately demonstrate adherence to national obligations for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for granting consent and hinder the competent authority's ability to ascertain the development's acceptability from a policy perspective.

The unprecedented scale of the proposal, characterised by large turbines situated near the shoreline, introduces considerable concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear non-compliance with policy illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents significant evidential deficiencies, characterised by gaps in baseline data and limitations in methodology. It relies on assumptions rather than site-specific evidence, resulting in uncertainty regarding the scale and significance of impacts. Specifically, conclusions regarding negligible or non-significant effects are not backed by robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Moreover, the Environmental Impact Assessment Report is materially deficient, lacking a full, transparent, or reliable account of the likely environmental effects of the proposal. The proposal utilises a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that is ultimately constructed, which prevents both the public and the competent authority from comprehending the true extent of environmental effects.

Consent is sought based heavily on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This approach means that environmental harm is intended to be addressed at a later stage, thereby obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of key information to post-consent stages is procedurally unacceptable, undermining the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly established prior to determination.

In light of these deficiencies, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements related to biodiversity protection and environmental integrity, as it cannot be established 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, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the proposed development is seriously flawed. It does not offer a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is known

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents a fundamentally flawed ornithological assessment, characterised by significant gaps in evidence and internal inconsistencies that severely undermine its conclusions. The proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already facing decline. However, the application fails to satisfy the required evidential standard to

demonstrate that these species will not be adversely affected.

A critical contradiction lies within the application itself; the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This incongruity raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It neglects to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor adds another layer of 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 thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

Regulatory compliance is also called into question, as the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, obstructing a lawful conclusion in favour of consent. Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistency, methodological flaws, and insufficient evidence. These shortcomings obstruct a thorough evaluation of impacts and contribute to the overarching conclusion that the application fails to meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, particularly in its treatment of the West Lewis coastline as a living cultural landscape. This area, where environment, language, tradition, and community intertwine, is not adequately acknowledged. Instead, the application adopts a narrow perspective, viewing heritage merely as a collection of static assets while overlooking their dynamic social, cultural, and spiritual significance within the community.

Among the key shortcomings is the inadequate treatment of culturally important sites,

such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment reduces them to mere static features. It fails to appreciate their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and neglects their vital role in community life.

Moreover, the assessment overlooks the importance of intangible cultural heritage, such as the Gaelic language and local traditions, which are essential to the identity of the area. The absence of these elements from the assessment represents a critical gap. Without acknowledging these factors, the true cultural impact of the development remains obscure.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity recognised as Indigenous People. However, there has been no process of Free, Prior and Informed Consent, compromising the credibility of the assessment and failing to adhere to established principles of participation in matters that affect cultural and environmental interests.

A significant procedural failing is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment impedes the competent authority's ability to legally evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these deficiencies position the proposal in direct opposition to National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as the living cultural practices, indicates a notable divergence from policy standards.

In summary, the failure to address living heritage, intangible cultural values, community rights, and adherence to statutory obligations results in a significant evidential void. The cultural effects of the proposed development have not been adequately assessed, leaving the application without a robust foundation for understanding the true cultural ramifications.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is significantly lacking and fails to provide the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the complete report has not been made available. This represents a critical evidential gap, hindering both public understanding and the competent authority's grasp of the full range of social risks identified through the developer's own research.

Summaries that are available suggest that residents are already experiencing

quantifiable stress, anxiety, and concern due to the scale and proximity of the proposal. These issues arise from direct engagement and are therefore factual. However, the inability to disclose the entire assessment prevents adequate scrutiny of the findings and restricts the capacity to ascertain their significance within the decision-making framework.

There is also an indication that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Nevertheless, these impacts have not been fully incorporated into the primary application or given sufficient consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This absence of transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function may be jeopardised. By failing to provide the comprehensive data, the application does not offer a complete evidential basis for evaluating the balance between potential benefits and detriments.

From a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and avoid causing harm, yet the evidence currently available points to existing adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This constitutes a material omission within the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of ongoing adverse effects, renders the assessment incomplete and unreliable. This situation impedes a lawful determination and supports the assertion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented within the application fails to adequately capture the scale of change and the sensitivity of the West Lewis environment. The coastline is characterised by its open Atlantic horizon, undeveloped landscape, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would result in a significant industrial presence, leading to a permanent and irreversible alteration of this distinctive character.

Furthermore, the evaluation lacks an accurate representation of the visual impact

anticipated from the turbines. Their scale and proximity would dominate views from residential zones, historic sites, and popular coastal areas, thereby negatively affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of this impact within the context of such a sensitive landscape.

There are also critical methodological shortcomings in the selection and depiction of 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 valued landscapes. This oversight raises concerns that the visual impact may have been understated, thereby compromising the assessment's overall reliability.

Another notable deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and various Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and their link to the natural horizon. This goes beyond merely a visual impact, constituting a broader cultural and spatial detriment that has not been properly considered in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which emphasises the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further detracts from any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Thus, the resulting changes would be fundamental and permanent, not amenable to acceptable levels of reduction through mitigation measures.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These significant deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the safeguarding of this landscape.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding its impact on fisheries and marine life, particularly due to its inadequate assessment of ecological and socio-economic

effects. The coastal waters off West Lewis are home to a vibrant marine ecosystem and support a thriving fishing industry, yet the application does not convincingly show how these activities and habitats can be preserved without considerable disruption.

A critical flaw in the application is the presumption that fishing activities can be relocated without repercussions. There is no evidence provided that alternative fishing grounds are available or capable of absorbing the additional fishing pressure. This lack of information is crucial, as it may lead to overfishing in other areas and could have severe economic repercussions for the local fishing fleet. The absence of a thorough and evidence-based assessment inhibits a proper understanding of the implications for fisheries and the livelihoods dependent on them.

Moreover, the proposal poses significant risks to marine species, particularly due to underwater noise generated during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disrupt marine life across extensive distances, particularly affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population is concerning; however, the application inadequately addresses these impacts, downplaying their importance without sufficient evidence.

Additionally, the application exhibits a contradiction by acknowledging the necessity of licenses to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding adherence to the Habitats Regulations, especially when anticipated harm necessitates legal authorisation.

The assessment also neglects to account for cumulative impacts that may arise from various pressures, including noise, habitat disturbance, 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 landscape.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It fails to establish that the development can coexist with current marine users or avoid significant negative effects on marine biodiversity, thus undermining any argument for the proposal being a form of sustainable development.

In summary, the deficiencies surrounding the evidence of fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings prevent a comprehensive evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding dark skies and nocturnal wildlife is a serious deficiency in the Environmental Impact Assessment. The West Lewis coastline is known for its

exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed development includes the installation of permanent red aviation lighting that would be visible over vast distances. This would create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time landscape.

The proposal fails to address how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to local identity and the emerging sector of astro-tourism. The absence of this analysis creates a notable gap in the overall assessment of both landscape and environmental effects.

Moreover, there is a complete lack of evaluation regarding the implications for nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and a heightened risk of collision. The application neglects to include any assessment of lighting impacts or a phototaxis study, failing to examine how aviation lighting might impact these species or exacerbate mortality rates.

This oversight is intensified by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data represents a crucial gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether the proposal could negatively impact protected species or designated sites. The necessary evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, particularly regarding the protection of natural areas and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night environment is a crucial aspect of the ecosystem.

In summary, 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 application neglects to properly assess the impacts on tourism, which is a vital component of the Isle of Lewis economy, and it fails to evaluate the economic and

social consequences for this key sector. Tourism relies heavily on the island's wild coastline, nearly untouched landscapes, dark skies, and the sense of remoteness that attracts visitors. While the application states that 86% of tourists are drawn to the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or their overall economic contribution.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and contributing up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the wider economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect an established and expanding sector.

Furthermore, the assessment overlooks the importance of environmental quality to tourism, including the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortfall, creating a significant gap in understanding the potential impacts on a growing segment of the local economy.

In an island community that faces challenges regarding economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and the sustainability of communities. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently examined, contrary to the requirements outlined in 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, failing to provide adequate evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the lack of quantification of tourism impacts, the failure to assess the environmental factors that influence visitor behaviour, and the disregard for the economic dependency of the island culminate in a substantial evidential gap. This inhibits 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 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 believe these wind turbines will negatively affect tourism in the Western Isles .
Tourism generates an income for the local communities .
The wind turbines will displace the tourism attracted to the unspoilt open vistas of the Islands .
Wind turbines will not generate anything for the population of the Isle of Lewis .

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: 013AB71E

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 presents serious deficiencies, lacking a thorough, transparent, and reliable evaluation of the anticipated environmental effects

of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, introduces significant uncertainty. This absence of fixed parameters hampers the consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. Consequently, the reported impacts may not accurately reflect the actual development that could be constructed, leaving both the public and the competent authority unable to grasp the true extent of potential environmental effects.

Furthermore, the application depends extensively on mitigation measures, monitoring strategies, and management plans that remain undefined. This reliance leads to consent being sought on the premise that environmental harm will be addressed subsequently, which hinders any meaningful evaluation of their effectiveness or the assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and runs contrary to the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly articulated before any determination.

Additionally, notable evidential gaps exist, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This situation creates uncertainty regarding both the scale and significance of the impacts, especially in instances where negligible or non-significant effects are concluded without substantial supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

As a result, the application fails to satisfy the evidential threshold set forth by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been shown that impacts have been comprehensively assessed or that appropriate safeguards are established.

In conclusion, the combination of an undefined design envelope, lack of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These issues prevent a lawful and robust assessment of environmental effects, meaning the competent authority lacks sufficient information to make an informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The absence of a structured and evidence-based assessment of alternatives is a serious concern that undermines the integrity of the Environmental Impact Assessment regime. The application fails to provide a comprehensive comparison of potential offshore locations, development scales, or design configurations that could have been

less harmful. Instead, it offers a narrative account detailing the evolution of the project, without showing that the developer has genuinely considered more environmentally friendly options, particularly those that could involve placing turbines further offshore. Given the significance of the West Lewis coastline, the proximity to shore plays a crucial role in determining impacts. This lack of analysis prevents any conclusion that the proposed siting is indeed the least damaging option available.

The inadequacies are further evident in the cable routing and landfall assessment, where the evidence suggesting that alternative routes have been explored is insufficient. This oversight includes sensitive areas with cultural and spiritual significance, such as Barvas Cemetery. The failure to implement a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than proactive measures designed to minimise harm.

Consequently, the application does not adequately demonstrate that environmental harm has been mitigated through careful site selection, layout, and routing of infrastructure. This neglect breaches the established mitigation hierarchy and leaves the competent authority unable to ascertain whether less damaging alternatives exist. Without a thorough assessment of alternatives, it cannot be claimed that the proposal is a sustainable or compliant solution.

From a policy standpoint, these deficiencies compromise adherence to the National Planning Framework 4, particularly regarding the safeguarding of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, ultimately leading to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed, failing to deliver a complete and dependable understanding of ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data provided is incomplete, and the methodologies employed inadequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not establish a solid evidential basis for evaluating impacts.

A significant oversight involves otters, a European Protected Species, where the application does not adequately recognise or assess their active utilisation of coastal areas for foraging and movement. The lack of evaluation regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently examined. This undermines any conclusions drawn about the absence of significant effects on this species.

Additional shortcomings are evident in the assessment of basking sharks, where the

reliance on aerial surveys introduces substantial detection bias, particularly in 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 integrate or appropriately consider such data leads to an incomplete baseline and diminishes the credibility of the conclusions presented.

These methodological limitations result in conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders meaningful evaluation of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This generates uncertainty concerning the actual scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been correctly identified or assessed. The uncertainty introduced prohibits the exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment concerning the ornithological implications of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its conclusions. Located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally significant seabird populations, the application fails to adequately demonstrate that these species will not face adverse effects. Despite acknowledging that seabird populations are already in decline, the assessment does not robustly evaluate critical factors such as displacement, collision risk, or habitat loss.

Moreover, a serious contradiction arises within the application. While the developer asserts that there will be no significant adverse effects, they simultaneously propose a Habitats Regulations derogation case, which is necessitated only where significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

The evidence regarding seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, is insufficient to assure that these species will remain unaffected. The significance of these crucial feeding grounds is not adequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for vulnerable species such as Kittiwakes and Fulmars. The methodologies

employed are likely to underestimate potential mortality, particularly when baseline data is lacking and behavioural responses are not fully comprehended.

Additionally, the placement of turbines within a recognised migratory corridor introduces a considerable risk, effectively obstructing a primary flight path utilized by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term repercussions of sustained mortality within this corridor or the potential impact on species with small global populations.

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This scenario invokes the precautionary principle, thereby obstructing a lawful conclusion in support of the proposed consent.

The identified deficiencies also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not experience adverse effects places the proposal in direct opposition to national policy.

In conclusion, the assessment is rendered unreliable due to its internal inconsistencies, methodological deficiencies, and lack of sufficient evidence. These weaknesses hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not fulfil the statutory requirements essential for its approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally flawed, as it neglects to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interwoven. Instead, the application adopts a narrow view, treating heritage as a collection of isolated, static assets rather than acknowledging their active social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial places and centres of spiritual practice; however, the assessment categorises them merely as static features, overlooking their ongoing significance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of the cultural effects and disregards the cemeteries' importance to community life.

Moreover, the assessment fails to include intangible cultural heritage, encompassing the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity but are

conspicuously absent from the evaluation, marking a considerable omission. Neglecting these factors hinders an accurate understanding of the cultural impact of the development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, which possesses a unique cultural identity recognised as characteristic of Indigenous Peoples, has not been granted the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Another critical issue is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. This omission means that the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. Without this assessment, a lawful determination cannot be reached.

From a policy standpoint, the identified deficiencies place the proposal in opposition to National Planning Framework 4, especially concerning the safeguarding of historic assets and sites. The oversight in considering both tangible and intangible heritage, as well as in recognising living cultural practices, clearly diverges from policy expectations.

In summary, the failure to properly assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a solid foundation for assessing the true cultural costs 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 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 application for the proposed construction raises significant concerns due to its incomplete assessment of construction and pollution risks. Substantial seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be devised after consent, which hinders a thorough evaluation of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures, especially 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 recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Moreover, there exists uncertainty regarding the scale and behaviour of sediment

plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly outlined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to granting consent, and the absence of such crucial information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These failures impede a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning contradiction regarding the potential harm to European Protected Species, where the need for licences is recognised while simultaneously describing impacts as negligible. This inconsistency raises significant doubts about the validity of the assessment and questions compliance with the Habitats Regulations, especially in cases where harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is inadequate, failing to deliver a thorough analysis of both ecological and socio-economic effects. The waters off the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry, yet there is no demonstration that these vital uses and habitats can be safeguarded without serious disruption. A key issue is the erroneous assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence indicating that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This gap is critical, as it poses risks of overfishing in other areas and could have broader economic repercussions for the local fishing fleet.

There is also a significant oversight in evaluating cumulative impacts from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is

impossible to ascertain the overall implications for marine ecosystems and socio-economic conditions. The proposal is set to introduce considerable risks to marine species, particularly through construction-related underwater noise. The use of high-energy hammer piling over extended durations is expected to disturb marine life across wide areas, with potential adverse effects on species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without adequate supporting evidence.

Additionally, from a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or avoid significant negative impacts on marine biodiversity, which hampers any assertion that the proposal constitutes sustainable development.

In conclusion, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the 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 inherently connected but are evaluated separately. This separation leads to a fragmented approach, obscuring the overall environmental and socio-economic effects.

Onshore components consist of cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered together. However, the division between offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and communities.

There are significant risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place. This creates an evident gap in biodiversity protection.

The proposal also raises issues regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is beneficial.

Additionally, routing the 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, casting doubt on its deliverability and legal compliance.

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

Overall, the separation of project components, lack of a comprehensive assessment, and absence of evidence regarding environmental and land use impacts result in this portion of the application being incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

Without a thorough assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites might face adverse effects. The

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

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

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

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it does not quantify how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution from tourism. The assessment of tourism impacts is inadequate and overlooks the economic and social consequences for a vital sector of the Isle of Lewis economy.

Tourism has seen significant growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and comprising up to 16% of the island's economy. Despite this growth, the application fails to analyse how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains unclear whether the proposed development would bring a net economic benefit or harm an established and expanding sector.

The assessment neglects to evaluate the critical role of environmental quality in sustaining tourism, including the value of unspoiled landscapes and dark skies to the visitor experience and emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impact on a recognised and growing part of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefit. It contradicts strategic objectives that identify tourism as a key growth sector and lacks sufficient evidence for the competent authority to assess the

economic consequences of the proposal.

Overall, the failure to quantify the impacts on tourism, evaluate environmental factors influencing visitor behaviour, and consider the island's economic reliance leads to a significant evidential gap. This results in an incomplete application and hinders a thorough evaluation of the economic effects.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential benchmarks. This application revisits the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current proposal emerges under a more robust policy framework that places increased emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

A thorough and reliable evidential basis for the determination of this application is not provided. There exist critical gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Additionally, there is a significant omission of crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of likely significant effects and residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment further represents a material omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage, does not prove that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of modelling on tourism impacts. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful conclusion regarding the

acceptability of impacts.

Additionally, the proposal would bring about 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 the impacts on tourism signify permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

To even consider a windfarm of that magnitude in that area is beyond belief. Not only detrimental to the ecology of the area but the landscape too. Also of massive emotional impact to the residents who will have to endure the low level noise pollution as well as the loss of dark skies and the fact that the turbines will be dominating the landscape of an area known for its natural beauty impacting tourism and the livelihoods of said residents.

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: 38B84366

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 application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, particularly in relation to its compliance with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain undefined. The adoption of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, there are evident and substantial conflicts with 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 adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine the proposal's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. When considered collectively, the lack of sufficient information, dependence on undefined mitigation, evidential deficiencies, and clear non-compliance with policy reveal that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

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 West Lewis coastline is recognised as a dynamic cultural landscape, where the interplay of environment, language, tradition, and community is vital. However, the current assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive perspective, treating heritage merely as isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static features, disregarding their continued use and the ramifications of development on their surroundings. This mischaracterisation leads to a flawed evaluation of cultural effects and ignores their integral role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language and traditions that underpin the community's identity and its relationship with the coastal environment. These elements are notably absent from the assessment, representing a significant oversight. Without incorporating these factors, the full cultural impact of the development remains elusive.

Concerns extend to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, yet the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement diminishes the legitimacy of the assessment and does not align with established principles for participation in matters impacting cultural and environmental interests.

Additionally, there is a critical procedural oversight in the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. This omission inhibits the competent authority's legal obligation to assess the social, cultural, and economic implications for the island community, resulting in a failure to meet statutory requirements.

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

Collectively, the lack of assessment for living heritage, intangible cultural values, community rights, and adherence to statutory mandates leads to a substantial evidential gap. Consequently, the cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines close to the shoreline threatens to establish a continuous industrial presence that would irrevocably alter this landscape. The assessment provided does not adequately capture the significant visual changes that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and detract from the essential qualities of naturalness and remoteness, while the assessment falls short in conveying the magnitude and significance of this impact on such a sensitive environment.

There are notable methodological flaws in how visual viewpoints have been selected and presented. Evidence points to the possibility that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, calling into question the reliability of the overall assessment.

Additionally, the evaluation fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever the existing relationships, fundamentally altering the context in which these heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not merely a visual impact but a more extensive cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The anticipated scale of change is incompatible with the essential need to protect landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further undermines any assertions of policy compliance.

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

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the intricate relationship between landscape and

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast sustain a diverse marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life associated with the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. A critical concern is the assumption that fishing activity can be relocated without repercussions. The application does not present evidence that alternative fishing grounds are accessible or capable of absorbing additional pressure. This lack of information is crucial, as displacing fishing activities could lead to overfishing in other areas and potentially have broader economic ramifications for the local fleet. Consequently, without a clear, evidence-based assessment, the effects on fisheries and local livelihoods remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise resulting from construction activities. Extended high-energy hammer piling is expected to cause disturbances across considerable distances, which could adversely affect species such as dolphins. The anticipated disruption to a substantial segment of the local bottlenose dolphin population raises serious issues, yet the application downplays the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application regarding the need for licenses to authorise harm to European Protected Species, while simultaneously asserting that such impacts are negligible. This contradiction undermines the assessment's credibility and raises concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal approval.

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

From a policy standpoint, the application lacks compliance with both the National Planning Framework 4 and the National Marine Plan. It does not demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This failure hinders the conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies in the assessment—specifically regarding evidence of fishing displacement, the minimisation of acoustic impacts, and internal

contradictions—render the evaluation incomplete and unreliable. These issues obstruct a robust appraisal of the impacts on marine life and fisheries.

TOURISM

The evaluation of tourism impacts within the application is seriously lacking, particularly regarding the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the region's natural assets, including its wild coastline, near-pristine landscapes, dark skies, and a prevailing sense of remoteness. The application indicates that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which has resulted in the support of more than 1,000 jobs and accounts for as much as 16% of the island's economy. However, the application does not address how the anticipated industrialisation of the seascape and a potential decline in environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this essential analysis, it is impossible to ascertain whether the development would yield a net economic benefit or instead jeopardise a vital and expanding sector.

Moreover, the assessment neglects to consider how environmental quality underpins tourism, especially the critical role of unspoiled landscapes and dark skies in shaping visitor experiences and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in the understanding of impacts on a recognised and growing segment of the local economy.

Given that the island community has limited economic diversification, the oversight in evaluating tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The failure to conduct a compliant Island Communities Impact Assessment suggests these economic vulnerabilities have not been thoroughly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not successfully demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the requirement to illustrate a net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic implications of the proposal.

In summary, the combined failures to quantify tourism impacts, assess the environmental influences on visitor behaviour, and recognise the island's economic dependencies result in a significant evidential void. This undermines a robust

assessment of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential requirements. The issues central to this application echo those that led to the 2008 rejection of the Lewis Wind Power proposal, where the degree of industrialisation was deemed unacceptable. This current proposal is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The application is lacking a complete and reliable evidential basis for decision-making. There are notable deficiencies in baseline data, the continued utilisation of an undefined design envelope, and an overreliance on unspecified mitigation measures. Moreover, it fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is insufficient and does not facilitate a thorough understanding of significant effects or residual impacts.

Procedural inadequacies are also evident. The absence of a compliant Island Communities Impact Assessment is a violation of the statutory duties mandated by the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment constitutes a critical omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Additionally, the proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage, nor does it prove that impacts on health and wellbeing are acceptable. Furthermore, it 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 sufficiently assessed, leaving the implications for peatlands, carbon balance, habitats, and crofting land unclear.

There are considerable uncertainties regarding environmental risks that may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

The proposal is likely to cause substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the negative impacts on tourism represent permanent changes that cannot be mitigated adequately.

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 should refuse consent on these grounds or enforce the relevant regulatory provisions to obtain the necessary missing information.

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

Additional Comments

Destroying the beautiful landscape with no benefits to 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: B8687DCF

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the proposal's scale, proximity, and design call into question its compliance with statutory requirements, national policy, and sustainable development principles.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, limited and inconsistent baseline information, and essential aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of potentially significant effects, and the unspecified nature of mitigation measures raises questions about their effectiveness. Consequently, the documentation fails to offer a complete and informed perspective on environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantive conflicts with policy are evident. The proposal seems 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 adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal raises alarm, with large turbines planned close to the shoreline, creating significant issues around landscape capacity, visual dominance, and environmental impact. In light of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and unable to support a lawful determination. In this context, the precautionary principle must be applied.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is significantly flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined.

The application approaches heritage in a limited manner, viewing it merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

Moreover, the application does not take into account the intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are essential to the area's identity but are wholly omitted from the assessment, which is a critical gap. Without addressing these factors, the cultural implications of the development cannot be fully grasped.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking community has a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a significant procedural flaw in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the process unlawful.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, constitutes a clear violation of policy standards.

In summary, the inadequate assessment of living heritage, intangible cultural value, community rights, and legal responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines along the West Lewis coastline raises significant concerns regarding its potential impact on the landscape, seascape, and cultural

heritage. The assessment is materially deficient, failing to adequately capture the magnitude of visual change and the sensitivity of this uniquely remote environment, characterised by its open Atlantic horizon and undeveloped character. The introduction of industrial turbines in close proximity to the shoreline would create a persistent industrial presence that would fundamentally alter the area's character, leading to a permanent transformation of the landscape.

The visual impact assessment does not sufficiently convey how the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would erode the defining qualities of naturalness and remoteness. This oversight undermines the assessment's reliability, as it does not accurately reflect the true significance of these impacts in such a sensitive landscape. Furthermore, methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence suggests that certain viewpoints may inadequately represent the most sensitive receptors or potential worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes, leading to an understatement of the visual impact.

Moreover, the assessment fails to recognise the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these heritage assets as isolated, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their setting and cultural significance. The proposed industrialisation of the seascape risks severing these crucial relationships, altering the context in which these heritage assets are experienced and disrupting their connection to the natural horizon.

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

Ultimately, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, leading to a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation. Collectively, these deficiencies highlight the inability of the assessment to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not take into account the full range of impacts associated with what constitutes a single integrated

project. There is an intrinsic link between the offshore turbines and the onshore works, which are assessed separately. This fragmented approach conceals the true magnitude of the environmental and socio-economic repercussions.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered collectively; however, the separation of offshore and onshore elements results in a lack of understanding regarding the combined effects on peatlands, habitats, and local communities.

There are considerable risks to vulnerable habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not show that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a notable evidential gap in terms of biodiversity protection.

The proposal also poses concerns regarding carbon balance. Disturbance to peatland can release stored carbon, potentially leading to a carbon debt that opposes the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not supply evidence 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 in its entirety and demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further diminishes the credibility of the application.

Collectively, the disjunction 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 assessment of the tourism impacts within the application is severely lacking and does not adequately evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could potentially influence visitor numbers, behaviour, or the overall economic contributions that tourism generates.

Since 2017, tourism has seen significant growth, rising from £65 million to over £81.5 million and supporting more than 1,000 jobs, accounting for up to 16% of the island's economy. Nevertheless, the application neglects to model how the industrialisation of the seascape and the associated decline in environmental quality could impact the Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains unclear whether the development would provide a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment overlooks the critical relationship between environmental quality and tourism, such as the significance of unspoiled landscapes and dark skies to the visitor experience, as well as the growing markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on an acknowledged and expanding segment of the local economy.

For an island community with limited economic diversification, the failure to properly assess the impacts on tourism carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated as mandated under the Islands (Scotland) Act 2018.

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

Collectively, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency leads to a substantial evidential gap. This gap obstructs a thorough evaluation of economic effects, reinforcing the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development according to statutory duties and national policy. The core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, primarily concerning unacceptable industrialisation, have not been adequately

addressed, despite the application being presented under a framework that places increased importance on biodiversity, peatland protection, and community wellbeing.

The evidential basis for determining this application is neither complete nor reliable. There are significant gaps in baseline data and a reliance on a design envelope that remains undefined. Mitigation measures are not specified, and critical impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. As a result, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

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

Furthermore, the proposal contradicts the National Planning Framework 4, failing to demonstrate biodiversity protection, acceptable health and wellbeing impacts, or net economic benefits, as there is no tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been adequately conducted, leaving unclear effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been met, which necessitates the application of the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

The proposal would also induce substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, along with the loss of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism, presents 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, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should refuse consent on these grounds or require the submission of the missing information through relevant regulatory provisions.

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

Additional Comments

If Spiorad na Mara goes ahead, I believe that depopulation of the indigenous people of the western isles will follow very quickly.

This should 100% not be allowed to happen.

If this is allowed to go ahead, the local decision makers should hang their heads in shame as it is all about greed and money. Did no one ever tell you, you can't take it with you.

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: 805B6FD2

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report contains substantial deficiencies and does not deliver a comprehensive, clear, or dependable account of the potential environmental effects stemming from the proposal. A critical issue arises from the

employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the consistent application of a worst-case scenario, ultimately undermining the assessment's integrity. Consequently, the impacts detailed may not accurately reflect the development ultimately built, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed at a later stage, which hinders any meaningful evaluation of effectiveness or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and at odds with the intended purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and their mitigations be clearly established before determination.

Additionally, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are presented without adequate 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.

As a result, the application does not fulfil the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards exist.

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 unreliable and incomplete. These deficiencies impede a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the submission provides a narrative on project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has adequately considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the failure to include such an analysis precludes any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence indicating that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis highlight that the principle of mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, which hampers the ability of the competent authority to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be confidently stated that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, these deficiencies significantly undermine adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a critical omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability in its understanding of the ecological receptors within the West Lewis coastal environment, which is a biologically active and sensitive marine system. The baseline data provided is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to deliver a solid evidential basis for evaluating impacts.

One significant oversight involves otters, a species protected under European law. The application does not sufficiently acknowledge or assess their active utilisation 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 impacts stemming from construction disturbance, noise, and increased human activity. This

flaw undermines any claims regarding the absence of significant effects on otters.

Deficiencies are also apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic weather conditions. This method is likely to lead to an underestimation of their presence when compared to established land-based observations that reveal frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline, thereby diminishing the reliability of the conclusions reached.

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

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. The failure to properly identify and assess protected species contributes to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. It has been identified that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The development is situated within crucial foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A major inconsistency arises within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment does not sufficiently confirm that seabirds linked to protected sites, such

as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not adequately considered, and the dependence on modelling approaches introduces a level of uncertainty, particularly concerning species facing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain insufficiently understood.

The location of turbines within a recognised migratory corridor adds another significant risk, effectively posing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential criteria necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which obstructs a lawful conclusion in favour of consent. Furthermore, the identified deficiencies represent non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and collectively contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is 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 lack of transparency surrounding the assessment of social impacts, health, and wellbeing raises significant concerns regarding the adequacy of the evaluation process. Although the developer commissioned a Social Impact Assessment that included input from local residents through focus groups, the full report remains unpublished. This creates a substantial evidential gap, inhibiting the public and the competent authority from comprehensively understanding the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct community engagement rather than speculative assumptions. Nonetheless, the non-disclosure of the complete assessment hampers thorough scrutiny of these findings and restricts the ability to assess their importance within the decision-making framework.

Furthermore, the proposal is viewed by many as a direct threat to community identity

and cohesion, with findings indicating a risk of “cultural loss.” Despite this, these social impacts have not been appropriately integrated into the primary application or given adequate consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

The implications for the Environmental Impact Assessment process are serious. To fully understand the social, economic, and health impacts of developments of this magnitude, particularly those that may alter community character, access to the complete dataset is essential. The application does not provide a comprehensive evidential basis for evaluating the balance between benefits and harms.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Development proposals must promote positive health outcomes and mitigate harm. However, the evidence that has been made available suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with relevant policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material failure in the application, undermining the evidential requirements of the Environmental Impact Assessment regime.

In summary, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts results in an incomplete and unreliable assessment. This situation prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to warrant approval.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The assessment provided does not sufficiently reflect the magnitude of the visual changes anticipated. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the region. The assessment fails to convey the true level of impact and its significance, given the sensitivity of the landscape involved.

Moreover, there are notable methodological shortcomings in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may

not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the potential visual impact has been underestimated, which undermines the reliability of the overall assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail to evaluate the likely environmental effects, as it does not provide a complete assessment of construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that will be developed post-consent. This approach is particularly troubling due to the sensitivity of the receiving environment, which includes the West Lewis coastline that supports clean coastal waters and important habitats vulnerable to sediment disturbance and contamination.

The risks acknowledged in the application, such as sediment mobilisation and accidental chemical or oil spills, are not accompanied by adequate preventative or control measures. The scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation remain uncertain, and without robust modelling and

defined management strategies, the ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

Compounding these issues is the absence of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage hinders any evaluation of whether appropriate safeguards are in place to manage pollution events. Such a process introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

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

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

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet there is no evidence in the application demonstrating that these habitats and activities can be protected or maintained without significant disruption.

A major concern lies in the assumption that fishing activities can be displaced without repercussions. The application does not offer proof that alternative fishing grounds exist, are accessible, or can handle additional pressure. This significant omission raises the risk of overfishing in other areas and poses potential economic challenges for the local fleet. The inability to deliver a clear and evidence-based assessment means that the effects on fisheries and livelihoods remain unclear.

Moreover, substantial risks to marine species are introduced, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over an extended timeframe is expected to cause disturbances across considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There is a notable inconsistency in the application that acknowledges the need for

licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately consider the impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are inherently connected, yet they are assessed in isolation. This fragmented approach obscures the true extent of environmental and socio-economic effects.

The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and the required access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The current application lacks a comprehensive assessment of these impacts, thus hindering a full understanding of the project's overall environmental footprint.

Exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; however, the segmentation of offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that

appropriate avoidance measures have been implemented. This creates a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. The disturbance of peatland results in the release of stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue nor does it show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, which raises questions about the deliverability 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 at odds with the National Marine Plan and the National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application.

In summary, the division of project components, the lack of a comprehensive assessment, and the absence of evidence regarding environmental and land use impacts result in this section of the application being incomplete and unreliable, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

Furthermore, the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors has not been evaluated. This oversight is especially troubling given the importance of dark skies to the area's identity. The lack of consideration for these impacts results in a clear deficiency in the overall environmental and landscape assessment.

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

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

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

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

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

TOURISM

Tourism on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not assess how the proposed large-scale offshore infrastructure could impact tourism, particularly in terms of visitor numbers and economic contributions. It is essential to understand that tourism relies heavily on the area's wild coastline, unspoiled landscapes, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of the potential effects on this key sector.

The assessment overlooks the importance of environmental quality for tourism. Unspoiled landscapes and dark skies are vital to visitor experiences, particularly for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impact on this growing part of the local economy.

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

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

In summary, the failure to quantify tourism impacts, evaluate environmental factors affecting visitor behaviour, and address the island's economic dependency leads to a significant evidential gap. This gap 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 starkly fails to meet the criteria for sustainable development when measured against statutory duties and national policy. It echoes the critical issues that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was established. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application presents serious deficiencies.

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

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

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

Uncertain and potentially significant environmental risks persist due to incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The necessary evidential threshold to exclude adverse effects beyond reasonable

scientific doubt has not been achieved, invoking the precautionary principle and preventing any lawful determination that impacts would be acceptable.

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

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

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

Additional Comments

All aspects of natural energy production need to be fully researched and presented in a transparent way to the local people of the island of Lewis. The same goes for all other proposed wind farm sites through our Scotland. There has to be some incentive for local buy in but even then people value their wild and free habits more than renewable energy. It must be a balanced and fair discussion.

Yours faithfully,

[Redacted]

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