

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 for marine licensing and Environmental Impact Assessment considerations. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals serious deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural significance. The proposal's scale, design, and proximity to the shore raise profound concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential foundation necessary for a lawful decision. Essential environmental data is absent, baseline information is inconsistent and limited, and numerous critical elements of the proposal remain unspecified. Furthermore, the reliance on a flexible design framework hinders a clear assessment of potential significant effects, while the unspecified mitigation measures mean their effectiveness cannot be judged. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Additionally, there are significant conflicts with existing policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately show that national standards for protecting biodiversity, climate interests, and environmental integrity can be upheld. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposed development, with large turbines situated close to the coastline, raises urgent concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and incapable of sustaining a lawful decision. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a complete, transparent, or trustworthy depiction of the likely environmental effects

associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of specificity hinders the ability to consistently apply a worst-case scenario, compromising the assessment's integrity. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, limiting both the public's and the competent authority's capacity to grasp the full extent of environmental effects.

The application places significant reliance 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 precludes any thorough evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation measures be clearly established prior to determination.

Moreover, there are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where conclusions regarding 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 aligned with statutory requirements.

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

Collectively, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects and result in the competent authority being unable to determine the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives fundamentally undermines compliance with the statutory requirements of the Environmental Impact Assessment regime. The application fails to provide a structured and reasoned comparison of realistic alternatives based on environmental effects, instead offering a narrative

account of the project's evolution. This method does not adequately illustrate that less harmful options have been identified, assessed, and chosen over more damaging solutions.

In terms of alternative offshore locations, development scales, or design configurations, the application lacks a transparent or evidence-based comparison. Notably, it does not show that the developer has genuinely considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be significantly reduced. The sensitive nature of the West Lewis coastline and the critical role of proximity to shore in determining impact highlight the shortcomings of the analysis, making it impossible to conclude that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation through design has not been adequately employed, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This shortfall indicates a failure to adhere to the established mitigation hierarchy, leaving the competent authority unable to ascertain whether there are less harmful and more suitable alternatives. In the absence of a robust alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant 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 coastal environment of West Lewis is characterised by a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. There is an incomplete understanding of ecological receptors within this area, primarily due to inadequate baseline data and ineffective methodologies that fail to accurately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A notable oversight in the application involves otters, which are classified as a

European Protected Species. The assessment does not adequately acknowledge their active use of coastal areas for foraging and movement, and it overlooks their core foraging range and behavioural patterns. This omission means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated, ultimately undermining claims of no significant effects on the species.

Further issues arise with the assessment of basking sharks, which relies heavily on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate or appropriately consider such information results in an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

The limitations in these methodologies lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species are inadequate. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate to the required evidential standard that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Key foraging areas and migratory pathways are located within the project area, yet the assessment does not thoroughly evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a contradiction in the application, as the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case,

which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment lacks sufficient proof that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. It inadequately accounts for the significance of these feeding grounds, relying on modelling methods that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor creates an additional and significant risk, functioning as a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application fails to adequately consider the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These deficiencies hinder a comprehensive evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead, it adopts a simplistic view, treating heritage merely as a collection of static assets, ignoring their ongoing social, cultural, and spiritual functions 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 for burial and spiritual practice, yet they are mischaracterised as static features. This oversight neglects their continued use and the importance of their settings, leading to an incomplete understanding of the cultural effects and their significance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language and local traditions, as well as the enduring relationship the community has with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the evaluation, resulting in a substantial gap in understanding the cultural impact of the development.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population is recognised as having a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles regarding participation in decisions impacting cultural and environmental interests.

Additionally, the failure to conduct a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018, represents a significant procedural lapse. This absence prevents the competent authority from meeting its legal obligation to evaluate the social, cultural, and economic impacts on the island community, thereby hindering a lawful determination.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the lack of recognition for living cultural practices, constitutes a clear deviation from policy requirements.

Overall, the failure to thoroughly assess living heritage, intangible cultural values, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment presents a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified through the developer's own research. This lack of transparency is particularly concerning given that the assessment was commissioned by the developer and included focus groups with local residents. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement, are substantive and should not be dismissed as speculative. The omission of the full assessment limits scrutiny of the findings and their significance in the decision-making process.

Moreover, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these crucial impacts have not been adequately integrated into the main

application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset prevents the application from offering a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development should foster positive health outcomes and mitigate harm, the existing evidence points to adverse effects that remain undisclosed. Thus, without the full assessment, compliance with the requisite policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential standards of the Environmental Impact Assessment regime.

In conclusion, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts renders the assessment incomplete and unreliable, preventing a lawful determination and affirming that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is deficient and does not fully capture the extent of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The proposed large-scale turbines near the shoreline would introduce a continuous industrial presence that would fundamentally alter this character and permanently transform the landscape.

The visual change anticipated from this application is not adequately represented. Due to their scale and proximity, the turbines would dominate views from nearby residential areas, historic sites, and popular coastal locations. This would directly impact visual amenity and diminish the natural and remote qualities that define the area. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence indicates that these viewpoints may not reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage

sites and significant landscapes. This oversight raises the possibility that the visual impacts have been understated, thereby questioning the reliability of the assessment.

Moreover, the assessment fails to address the interconnected relationship between landscape, seascape, and cultural heritage. Notably, sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the wider landscape through visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated, the assessment neglects their interdependence, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and diminishing their link to the natural horizon. This not only represents a visual impact but also signifies 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, particularly concerning the protection of natural areas and historic assets. The extent of change proposed is inconsistent with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case scenario analysis further weakens any assertion of compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in their dominant and unavoidable presence. Consequently, the changes would be fundamental and permanent, making mitigation ineffective.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The proposal involves significant seabed preparation and installation works in a challenging Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be formulated after consent, hindering any meaningful assessment of their suitability or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the local environment. The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not provide adequate details on how

these risks will be prevented, controlled, or monitored.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes generated from seabed disturbances and cable installations. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these disturbances. This uncertainty also extends to potential impacts on marine species and habitats that have been identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures adds to these concerns. By postponing contingency planning until after consent, the application fails to allow for the evaluation of whether appropriate measures 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 time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of specified mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts render the assessment significantly deficient. These issues impede a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application's assessment of fisheries and marine life is inadequate and lacks a thorough evaluation of ecological and socio-economic impacts. The West Lewis coast is home to both a diverse marine ecosystem and an active fishing industry, yet the proposal fails to adequately demonstrate that these essential uses and habitats can be safeguarded without substantial disruption.

A critical concern is the flawed assumption that fishing activities can be relocated without negative repercussions. The application offers no proof that alternative fishing grounds exist, are accessible, or can sustain increased fishing pressures. This significant oversight poses the risk of overfishing in other areas, potentially leading to broader economic impacts on the local fishing fleet. In the absence of a clear, evidence-based evaluation, the implications for fisheries and livelihoods remain unclear.

The proposal also presents considerable risks to marine species, particularly due to the underwater noise created during construction. Prolonged high-energy hammer piling is expected to disturb marine life across extensive areas, impacting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose

dolphin population is alarming; however, the application downplays these effects without sufficient corroborating evidence.

There is a notable contradiction within the application that acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This inconsistency undermines the reliability of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm warrants legal authorisation.

Moreover, the assessment neglects to address cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to adequately assess the full scope of impacts associated with the entire project, which includes both offshore turbines and onshore infrastructure. By treating these components separately, it obscures the true scale of the environmental and socio-economic effects. Significant onshore activities involve the installation of cabling across protected moorland and the construction of a substation near Stornoway, with associated access routes through sensitive landscapes. These operations necessitate excavation in areas of deep peat, particularly within Barvas Moor, a habitat crucial for carbon storage and ecological balance. The lack of a comprehensive assessment of these impacts hampers understanding of the project's overall environmental footprint.

Furthermore, the failure to consider onshore impacts in conjunction with offshore elements prevents a full evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be assessed together, yet the division of assessments means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood. This situation poses significant risks to sensitive ecosystems, including machair systems and peatland environments, which are protected by policy. There is insufficient evidence in the application to confirm that impacts on these habitats have been thoroughly evaluated or that effective avoidance strategies have been implemented, revealing a troubling gap

in biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this critical issue or confirm that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land could lead to conflicts with established land use and legal rights. The application lacks evidence that the necessary consents or processes for such land use changes have been initiated, raising concerns about the feasibility and lawful execution of the project.

From a policy standpoint, the incomplete assessment of the project as a whole, coupled with the failure to safeguard peatlands, habitats, and land use interests, contravenes guidelines outlined in the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated significantly undermines the application's credibility.

In summary, the disjointed approach to assessing project components, the absence of a thorough evaluation, and the lack of substantiating evidence regarding environmental and land use impacts render this segment of the application both incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

Crucially, the assessment fails to evaluate the impact of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application lacks any lighting impact assessment or phototaxis study, leading to a failure in evaluating how aviation lighting may affect these species or escalate mortality rates.

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

Without a proper evaluation of nocturnal impacts, it remains impossible to ascertain

whether protected species or designated sites will be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thus invoking the precautionary principle and hindering a lawful determination.

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

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

TOURISM

The tourism sector on the Isle of Lewis plays a crucial role in the local economy, contributing over £81.5 million and supporting more than 1,000 jobs. This sector accounts for up to 16% of the island's economy and has seen significant growth since 2017. However, the assessment of tourism impacts within the application is materially deficient, failing to evaluate the economic and social consequences for this key sector.

Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure could impact visitor numbers, behaviours, or the overall economic contribution.

The application also overlooks the importance of environmental quality in supporting tourism, particularly regarding unspoiled landscapes and dark skies. This neglect is further highlighted by the absence of a Dark Skies Assessment, leaving a gap in understanding the impacts on growing sectors such as nature-based tourism and astro-tourism.

In an island community with limited economic diversification, the lack of assessment on tourism impacts raises serious concerns about employment, local businesses, and community sustainability. Furthermore, the omission of a compliant Island Communities Impact Assessment means 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, particularly regarding economic impact and the necessity to show net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector, failing to provide sufficient evidence for the competent

authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate environmental influences on visitor behaviour, and acknowledge the island's economic dependency creates a significant evidential gap. This gap hinders a robust assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal exemplifies a significant shortfall in meeting the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application revisits the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is being evaluated under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

Critical deficiencies in the evidential basis for this application are apparent. There are significant gaps in baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Additionally, it neglects important impact pathways such as nocturnal wildlife, complete onshore infrastructure, and the potential effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural inadequacies are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of a complete Social Impact Assessment represents a substantial omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate protection for biodiversity, natural environments, or cultural heritage. Additionally, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring their consequences 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 inconsistent in parts. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would lead to substantial and irreversible changes to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and the negative consequences for tourism represent enduring effects that cannot be mitigated to a satisfactory level.

In summary, the application is both procedurally and substantively inadequate for determination. The extensive information gaps, policy conflicts, and unresolved environmental risks collectively preclude a lawful and evidence-based decision. The competent authority should either deny consent on these grounds or enforce relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I feel sad and despairing about these massive industrial developments which will ruin my homeland for generations to come. There are so many reasons this should not go ahead, with risks to the population through pollution, stress, loss of quality of life, cultural identity, ruined surroundings and other environmental impacts.

We are rightly proud of our beautiful, unique surroundings and culture. This is a disgraceful development which should be resisted. The island is to be ruined and bled dry by huge corporations without benefit to the community. Disgraceful.

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: 818840A5

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental management, cultural considerations, and procedural compliance. Situated off the west side of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of the proposed development raise essential concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the available baseline information is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework impedes a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents any meaningful evaluation of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are significant policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines positioned alarmingly close to the shoreline. This introduces considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report associated with the proposal is fundamentally inadequate, lacking a comprehensive, transparent, and dependable evaluation of its potential environmental effects. The employment of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This ambiguity hinders the consistent application of a worst-case scenario analysis, ultimately compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately reflect what will be constructed, obscuring the true extent of environmental consequences from both the public and the competent authority.

Furthermore, the application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions, where environmental harm is purportedly to be addressed subsequently, obstructs any substantive evaluation of effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent phases contravenes the procedural requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established before any determination is made.

Moreover, there exist notable evidential shortcomings, including deficiencies in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such inadequacies lead to uncertainties regarding the magnitude and significance of impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting data. The lack of comprehensive information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory obligations.

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

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the notable gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and rigorous evaluation of environmental effects and result in the competent authority lacking the requisite information to appropriately determine the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It does not provide a reasoned comparison of realistic alternatives based on their environmental effects but instead presents a narrative of project evolution. This approach does not adequately demonstrate that less harmful options have been identified, assessed, and preferred over more damaging solutions.

There is a noticeable absence of transparent comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the developer has not shown that they have seriously considered positioning the turbines further offshore, which would likely reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, as well as the critical role of proximity to shore in assessing impact, the lack of such analysis precludes any conclusion that the proposed siting is the least damaging option.

The deficiencies in the application also extend to the assessment of cable routing and landfall, revealing insufficient evidence that alternative routes have been thoroughly examined to avoid or mitigate 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 demonstrates that mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This shortcoming reflects a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy 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 constitutes a material omission, contributing to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of ornithological impacts is fundamentally inadequate, presenting significant gaps in evidence and inconsistencies that compromise its conclusions. The application does not convincingly show that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline, will remain unaffected. The development site lies within critical foraging areas and migratory routes, yet fails to thoroughly assess the potential risks of displacement, collision, or habitat loss for these species.

A core contradiction arises within the application, as it asserts no significant adverse

effects while simultaneously proposing a Habitats Regulations derogation case, a requirement that only emerges when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that its conclusions lack sufficient backing from the evidence provided.

Moreover, the evaluation does not adequately address the potential impacts on seabirds linked to protected sites, including the Lewis Peatlands and St Kilda. The significance of these feeding grounds has not been fully recognised, and the use of modelling methods introduces further uncertainty, particularly concerning species in critical decline such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the unclear understanding of species' behavioural responses.

The positioning of turbines within a designated migratory corridor presents a substantial risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application inadequately considers the long-term consequences of sustained mortality in this corridor and fails to assess the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, in conjunction with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, undermining any lawful basis for consent.

Additionally, the identified shortcomings indicate a non-compliance with the National Planning Framework 4 regarding the protection of biodiversity and the preservation of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted directly conflicts with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of potential impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning community identity and cultural heritage is profoundly inadequate, failing to appreciate the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts an overly simplistic approach, treating heritage as a collection of isolated, static elements rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming lies in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for

burial and spiritual practice, yet the assessment reduces them to static features, neglecting their continued use, importance, and the influence of development on their surroundings. This mischaracterisation leads to an incomplete assessment of cultural effects and overlooks their vital role in community life.

Additionally, the application does not adequately address intangible cultural heritage, including the Gaelic language, traditions, and the community's enduring relationship with the coastal environment. These components are crucial to the area's identity but are entirely overlooked in the assessment, representing a significant gap. Without recognising these aspects, the true cultural impact of the development remains obscured.

Moreover, there are significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity acknowledged as that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A notable procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This lack of assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination unachievable.

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

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and compliance with statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not offer an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This significant evidential gap obstructs both the public and the competent authority from grasping the complete extent of social risks identified in the developer's own research. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement rather than speculation, but the failure to disclose the full assessment hampers proper scrutiny of the findings and limits the capacity to evaluate their

significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings acknowledging "cultural loss." Despite this recognition, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. By not providing the complete dataset, the application fails to offer a comprehensive evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm; however, the available evidence points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, which constitutes a material omission within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and strengthens the argument that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not accurately reflect the scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. Introducing large-scale turbines near the shoreline would result in a continuous and imposing industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application fails to adequately represent the extent of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact,

especially within such a sensitive landscape.

There are also critical methodological issues regarding how visual viewpoints have been selected and presented. 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 landscapes of high value. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated entities rather than acknowledging their interdependence, leading to an incomplete analysis of the impacts on their setting and cultural significance.

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

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

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 dominant and unavoidable. The resulting change is, therefore, fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is notably deficient. The proposal entails significant seabed preparation and installation work in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on undefined mitigation and contingency measures that would only be prepared after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures raises concerns, particularly given the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats, which are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and undermines the competent authority's ability 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. Significant effects and necessary mitigations must be evaluated prior to consent; without this information, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The concerns regarding the assessment of fisheries and marine life highlight significant shortcomings in evaluating ecological and socio-economic impacts. The West Lewis coast is home to a rich marine ecosystem and supports an active fishing industry. However, the proposal does not adequately ensure the protection or maintenance of these vital habitats and activities, raising serious concerns about potential disruptions.

A major flaw in the application is the erroneous assumption that fishing activities can be easily displaced without negative effects. There is no supporting evidence indicating that alternative fishing grounds are available or capable of sustaining increased pressure. This lack of consideration is crucial, as it risks overfishing in other areas and may lead to broader economic repercussions for the local fishing community. The

absence of a clear and substantiated assessment inhibits a proper understanding of the impacts on fisheries and local livelihoods.

Moreover, the potential risks to marine species, especially due to construction-related underwater noise, are of great concern. The expected high-energy hammer piling over a prolonged period poses disturbances that could affect marine life, including the local bottlenose dolphin population. Despite the predicted significant disruption, the application downplays these potential effects and fails to provide adequate supporting evidence for its claims.

There exists a troubling inconsistency in the application, acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction not only undermines the credibility of the assessment but also raises significant questions regarding adherence to the Habitats Regulations, especially in instances where anticipated harm necessitates legal approval.

Additionally, the application does not address cumulative impacts stemming from various pressures like habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic fabric of the area.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, casting doubt on the notion that this proposal aligns with sustainable development principles.

In summary, the gaps in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application collectively render the assessment incomplete and unreliable. These issues obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal's assessment of onshore infrastructure is fundamentally inadequate and neglects the full range of impacts from what constitutes a single integrated project. The offshore turbines and the onshore elements are inherently connected, yet they are evaluated separately, which leads to a fragmented understanding that obscures the true magnitude of the environmental and socio-economic repercussions.

Included in the onshore aspects are cabling that traverses protected moorland, the construction of a substation near Stornoway, and related access infrastructure that crosses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically important habitat. The application fails to deliver a thorough assessment of these impacts, which

hinders a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of the assessment of onshore impacts restricts a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the bifurcation of offshore and onshore elements results in an incomplete picture regarding the combined effects on peatlands, habitats, and local communities.

There are also serious risks posed to sensitive habitats, such as machair systems and peatland environments, which are afforded policy protection. The application does not establish that the impacts on these habitats have been comprehensively assessed or that appropriate measures for avoidance have been implemented. This creates a significant evidential gap concerning biodiversity protection.

The proposal brings forth additional concerns related to carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance remains beneficial.

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not furnish evidence that the requisite consents or processes have been initiated, which raises significant doubts about deliverability and lawful implementation.

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 National Planning Framework 4. The lack of evidence to show that impacts can be avoided or mitigated further diminishes the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant omission within the Environmental Impact Assessment, undermining its completeness. The West Lewis coastline is noted for its exceptionally dark skies, which are critical to the region's environmental quality, cultural identity, and the value of tourism. The proposal includes the introduction of permanent red aviation lighting that will be visible over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change will fundamentally alter the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual

amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the identity of the area and the emerging tourism sectors, such as astro-tourism, this omission is particularly important. The absence of these considerations indicates a clear gap in the overall landscape and environmental assessment.

Additionally, there is no evaluation of how the proposed lighting may affect nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are highly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The application does not provide any lighting impact assessment or phototaxis study, which would be necessary to evaluate the potential effects of aviation lighting on these species or the risk of increased mortality.

This gap is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities and their associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts.

Without a proper assessment 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 achieved, thus invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It further diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is a crucial component of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife results in a substantial 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 proposal under consideration overlooks the essential economic and social impacts on a vital sector of the Isle of Lewis economy, specifically tourism. This sector relies heavily on the area's wild coastline, nearly unblemished landscape, dark skies, and its inherent sense of remoteness. Although the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution of tourism.

Tourism on the island has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs, contributing up to 16% to the local economy. Nevertheless, the application neglects to model the potential effects of seascape industrialisation and the accompanying decline in environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in underpinning tourism, including the necessity of unspoiled landscapes and dark skies for an enriching visitor experience. The exclusion of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable void in understanding the impacts on a recognised and expanding part of the local economy. This is particularly pertinent for an island community characterised by limited economic diversification, where the lack of impact assessment on tourism extends to broader implications for employment, local enterprises, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to substantiate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate a net benefit. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the collective failures to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminate in a significant evidential gap. This gap hinders a thorough assessment of the economic effects and reinforces the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights significant shortcomings in meeting the principles of sustainable development as established by statutory obligations, national policy, and necessary evidential standards. It revisits core issues that were the basis for the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still fails to adequately address these concerns.

A comprehensive and reliable evidential foundation for determination is notably lacking in the application. There are critical deficiencies in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address

key impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or any residual impacts.

Moreover, the application reveals clear procedural deficiencies. The lack of a compliant Island Communities Impact Assessment represents a failure to adhere to the statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to provide a full Social Impact Assessment constitutes a material omission, which obstructs the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience. These failings are sufficient to render the application unsuitable for determination.

The proposal directly conflicts with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it 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. The cumulative impact of both offshore and onshore elements has not been properly assessed, thereby obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, which engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would induce significant and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism represent permanent alterations that cannot be mitigated to an acceptable degree.

In conclusion, the application is procedurally and substantively unfit for determination. The extent of information deficiencies, combined with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

Our way of life and precious lands cannot continue to be exploited for profit any longer on the pretext of green energy. There's nothing green about this !

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4861BF4C

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment processes. A careful review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies across 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. The scale and design of the proposal, combined with its proximity to the shoreline, lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis required for a lawful determination. There are critical gaps in environmental data, with limited and inconsistent baseline information, leaving many key aspects of the proposal undefined. The flexible design framework employed means that the potential significant effects cannot be clearly understood, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documents fail to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by robust evidence.

In addition, there are significant policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and weaken the competent authority's ability to determine the proposal as acceptable from a policy standpoint.

The unprecedented scale of the proposed wind farm, with large turbines situated close to the shoreline, raises serious issues relating to landscape capacity, visual impact, and overall environmental consequences. Collectively, the insufficiency of information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrate that the application is incomplete and unfit for lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, clear, or credible account of the anticipated environmental effects associated with the proposal. One significant issue is the introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This element creates substantial uncertainty and hinders the application of a consistent worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority without a true understanding of the environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. The request for consent is predicated on the assumption that any environmental harm will be addressed subsequently, which obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contravenes the aims of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated prior to determination.

Additional evidential deficiencies are present, notably gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings result in uncertainty regarding the magnitude and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information precludes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

As a result of these issues, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to meet the requirements related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that adequate safeguards are in place.

In conclusion, the combination of reliance on an undefined design envelope, lack of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, meaning that the competent authority cannot justifiably determine the application based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly lacking, failing to provide a thorough or dependable understanding of the ecological receptors present within the West Lewis coastal environment. This area is recognised for its biological activity and sensitivity, yet the baseline data remains incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment falls short of offering a solid evidential foundation for impact evaluation.

In particular, there is a crucial oversight concerning otters, a species that is protected under European law. The application neglects to adequately recognise and assess their active utilisation of coastal zones for both foraging and movement. This failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts arising from construction disturbance, noise, and increased human activity. Such oversights undermine any conclusions drawn regarding the absence of significant effects on this species.

The evaluation of basking sharks also reveals serious deficiencies, particularly due to the reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show frequent usage of these waters. The disregard for such pertinent data leads to an incomplete baseline and undermines the validity of the conclusions reached.

These methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Furthermore, the lack of comprehensive baseline data hampers meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true extent of the risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty arising from these deficiencies prevents the definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, revealing significant 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 sufficiently demonstrate that these species will not face adverse effects. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A notable contradiction arises within 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 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.

Furthermore, the assessment does not convincingly establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively addressed, and the reliance on modelling introduces uncertainties, particularly concerning species that are in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in areas where baseline data is insufficient and behavioural responses remain poorly understood.

The positioning of turbines within a designated migratory corridor presents an additional and considerable risk, 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 implications of sustained mortality within this corridor or its potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, hindering any lawful conclusion in support of consent.

Moreover, the identified deficiencies signify a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally 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 internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings obstruct a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under review demonstrates a fundamental inadequacy in the assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a living cultural landscape, where environment, language, tradition, and community are deeply interconnected. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a reductive approach that treats heritage as isolated, static assets.

A significant shortcoming is evident in the treatment of culturally significant sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries are active burial and spiritual practice sites, yet they have been categorised as static features in the assessment. This oversight neglects their continued use and meaning, as well as the development's impact on their setting. The resulting mischaracterisation leads to an incomplete evaluation of cultural effects and ignores the cemeteries' roles within community life.

Furthermore, the assessment neglects intangible cultural heritage aspects, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are entirely absent from the evaluation, representing a significant omission. Without incorporating these factors, the true cultural impact of the development cannot be understood.

Concerns regarding community rights and engagement are also paramount. The Gaelic-speaking population has a unique cultural identity that aligns with characteristics of an Indigenous People, but the absence of a Free, Prior and Informed Consent process undermines the legitimacy of the assessment. This lack of meaningful engagement fails to reflect 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, a statutory requirement under the Islands (Scotland) Act 2018. This omission precludes the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

From a policy standpoint, these deficiencies place the proposal in direct conflict with the National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the lack of recognition of living cultural practices, constitutes a clear deviation from policy requirements.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application lacks a sufficient foundation for evaluating the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally inadequate and fails to capture the full extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unspoilt Atlantic views, lack of development, and a pronounced sense of remoteness. The proposed large-scale turbines positioned near the shoreline would create an industrial presence that is both continuous and dominant, leading to a permanent and irreversible alteration of this landscape.

The representation of the visual changes resulting from the application is insufficient. Given the scale and close proximity of the turbines, they are set to dominate the views from residential zones, historical landmarks, and popular coastal areas. This intrusion would impact visual amenity directly and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the framework of such a sensitive landscape.

Methodological issues arise concerning the selection and display of visual viewpoints. Evidence indicates that the viewpoints presented may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to crucial cultural heritage sites and landscapes of high value. This raises concerns that the extent of visual impact may have been understated, thereby compromising the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notably, locations such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, interconnected through visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete analysis of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, fundamentally altering the context in which heritage assets are perceived and severing their ties to the natural horizon. This situation represents not merely a visual impact but also a broader cultural and spatial detriment that the application has not sufficiently addressed.

From a policy standpoint, the proposal directly contravenes National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The magnitude of change is incompatible with the obligation to maintain landscape character, visual amenity, and the context of culturally significant locations. The lack of a thorough worst-case analysis further diminishes any assertion of policy compliance.

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

In summary, the assessment does not accurately reflect the degree of impact, the sensitivity of the environment, or the interconnected relationships between landscape and heritage. These shortcomings preclude a dependable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal does not adequately address construction and pollution risks, leading to an incomplete assessment of potential environmental effects. There is significant seabed preparation and installation planned in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans raises serious concerns. Instead, the application relies on mitigation and contingency measures that would be created after consent, which makes it impossible to assess their sufficiency or effectiveness.

This issue is particularly alarming because the West Lewis coastline features clean coastal waters and important habitats that could be harmed by sediment disturbance and contamination. Although the application notes risks such as sediment mobilisation and the possibility of chemical or oil spills, it lacks sufficient detail on how these incidents will be prevented, controlled, or monitored.

There is also ambiguity surrounding the behaviour and scale of sediment plumes that might result from seabed disturbance and cable installation. Without strong modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty encompasses potential consequences for marine species and habitats that have already been recognised as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders the evaluation of whether adequate safeguards are in place for addressing pollution events. This introduces procedural risks and hampers the competent authority's ability to assess the environmental protection measures necessary at the determination stage.

From a regulatory standpoint, postponing vital environmental safeguards goes against the requirements set by the Environmental Impact Assessment regime. Significant effects and their mitigation must be reviewed before consent is granted, and without this information, a lawful determination cannot occur. The application also does not prove adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts make the assessment materially inadequate. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the notion 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 application presents a materially incomplete assessment of onshore infrastructure, failing to fully account for the impacts of what constitutes a single integrated project. The offshore turbines are linked with the onshore works, yet these components are evaluated separately, leading to a fragmented approach that obscures the actual extent of environmental and socio-economic effects.

Specifically, the onshore works involve cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure through sensitive landscapes. This construction entails excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. Without a comprehensive assessment of these impacts, the application does not provide a full understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not adequately understood.

Concerns also arise regarding the potential risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protections. The application does not demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, thus revealing a significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises serious questions about carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially resulting in a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains favourable.

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

From a policy standpoint, the failure to assess the project as a cohesive whole and to demonstrate the protection of peatlands, habitats, and land use interests is in direct conflict with the National Marine Plan and National Planning Framework 4. The lack of evidence that impacts can be avoided or mitigated further undermines the application's credibility.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts

render this section of the application incomplete and unreliable, ultimately preventing a lawful determination.

TOURISM

The evaluation of tourism impacts is inadequate and neglects to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs while representing up to 16% of the island's economy. Despite this, 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 resilience of the wider economy.

Tourism fundamentally relies on the island's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or overall economic contributions. Additionally, the significance of environmental quality in supporting tourism has not been adequately addressed. The importance of unspoiled landscapes and dark skies to the visitor experience, along with the potential for growth in markets such as nature-based tourism and astro-tourism, has been overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the impacts on an important and expanding sector 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 thorough Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

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

In summary, the combination of unquantified tourism impacts, an inadequate assessment of environmental factors influencing visitor behaviour, and a lack of consideration for the island's economic dependency creates a significant evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its failure to meet the requirements of sustainable development, as assessed against statutory obligations, national policy, and evidential standards. This application mirrors the core

issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Now, despite being put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it falls short of the necessary standards.

The evidential basis for determining this application is incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and the reliance on unspecified mitigation measures is problematic. Additionally, it overlooks essential impact pathways, including those concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are evident throughout the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties set forth in the Islands (Scotland) Act 2018. Furthermore, the omission of the full Social Impact Assessment constitutes a material failure. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural spaces, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. There is also a lack of evidence for a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in various areas. The evidential requirements needed to exclude adverse effects beyond reasonable scientific doubt have not been satisfied, necessitating the application of the precautionary principle, which prevents a lawful determination that impacts are acceptable.

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

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

In light of these considerations, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Additional Comments

My paternal grandmother's people are from Lewis and I had the great privilege of visiting in 2023 with my son. We stood quietly in the cemetery in Barvas where countless generations of our family is resting. It was incredibly moving and deeply meaningful to be in such a beautiful, wild place among the ancient stones marking where family is buried, to look out at the sea and the land, knowing I belong. Callanais not far away. My grandmother visited often and was greeted as a returning daughter. I felt that homecoming, too. To think that very spot is facing destruction and desecration is just devastating to me and my family, the generations long, long before, and those to come. Barvas, Lewis, is not an empty, inconsequential place for the taking. As a Canadian with deep Scottish roots, please, please do not destroy the Isle of Lewis. There has to be another way.

[Redacted]

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 7E48D7FE

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regulations. Upon reviewing the Environmental Impact Assessment Report and associated documentation, significant deficiencies have been identified regarding material planning, environmental, cultural, and procedural matters. 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 heritage. The scale, design, and proximity of the wind farm raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. Critical environmental data is absent, baseline information is both limited and inconsistent, and many key aspects of the project remain undefined. The flexible design framework employed does not allow for a clear understanding of the likely significant effects, while the proposed mitigation measures, which are not specified, hinder the ability to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by robust evidence.

There are evident and serious conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and compromise the competent authority's capacity to determine the proposal's acceptability in policy terms.

The proposal's scale is unprecedented for this location, with large turbines planned in close proximity to the shoreline, leading to significant concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to provide a reliable account of the likely environmental effects of the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific dimensions, layouts, or configurations of the turbines. This introduces considerable uncertainty and hinders the ability to apply a worst-case scenario consistently. As a result, the assessment's integrity is compromised, making it difficult for both the public and the competent authority to grasp the true environmental impacts of the development.

The application relies on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under these conditions means that any potential environmental harm is to be addressed at a later stage, which obstructs a meaningful evaluation of effectiveness or an assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Additionally, 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 concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that conflicts with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked, particularly regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards are implemented.

In summary, the combination of an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies prevent a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives is a significant concern, as it does not fulfil the statutory requirements set by the Environmental Impact Assessment regime. The application provides a narrative account of the project's development rather than a structured, reasoned comparison of viable alternatives based on their environmental impacts. This failure raises questions about whether less harmful options have been

adequately identified, assessed, and prioritised over more damaging solutions.

Moreover, the lack of a transparent, evidence-based comparison extends to the assessment of alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, where there would likely be reduced visual, ecological, and coastal impacts. The sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in determining impacts further highlight the absence of this analysis, preventing any conclusion that the proposed siting is the least damaging option available.

Concerns about deficiencies also relate to cable routing and landfall assessment. There is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the concept of mitigation by design has not been considered, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to determine whether more suitable, less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant omission, contributing to the overall assessment 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 demonstrates significant deficiencies, failing to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data provided is incomplete. Moreover, the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, resulting in an assessment that lacks a solid evidential basis for evaluating potential impacts.

Notably, the application neglects to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to

an inadequate assessment of the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduces substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider such critical data results in an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on 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 uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal presents significant flaws, including internal inconsistencies and evidence gaps that undermine its conclusions. The application is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, an area known to support internationally important seabird populations that are already in decline. However, it fails to convincingly demonstrate that these species will remain unaffected.

There exists a fundamental contradiction within the application. The developer asserts that there are 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 doubts about the reliability of the assessment, suggesting that its conclusions are not backed by the evidence presented.

The assessment does not adequately address the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical importance of

these feeding grounds is underappreciated, and reliance on modelling approaches introduces uncertainty, especially for species like Kittiwakes and Fulmars that are experiencing severe decline. The methodologies employed are likely to underestimate mortality, particularly when baseline data is lacking and species behaviour is not fully understood.

The proposed siting of turbines within a recognised migratory corridor creates a significant risk, forming a barrier along a primary flight path used by birds travelling between the United Kingdom and Iceland. The application lacks a thorough assessment of the long-term effects of ongoing mortality in this corridor, as well as the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the proposal does not satisfy the evidential standard required to demonstrate that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling shortcomings, means that the necessary standard of certainty has not been achieved. This situation activates the precautionary principle and renders a lawful conclusion in favour of consent impossible.

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

In summary, the assessment is deemed unreliable due to its inconsistencies, methodological flaws, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements essential for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets rather than recognising their ongoing social, cultural, and spiritual relevance 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. Despite their continued use and significance, the assessment categorises them as static features, neglecting their ongoing meaning and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The assessment also fails to account for intangible cultural heritage, including the

Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the evaluation, representing a significant oversight. Ignoring these factors means that the true cultural impact of the development cannot be accurately assessed.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity recognised as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018, highlights a critical procedural failure. 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 oversight alone hinders a lawful determination.

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

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application lacks a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment presents a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified through the developer's own research. This lack of transparency is particularly concerning given that the assessment was commissioned by the developer and included focus groups with local residents. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement, are substantive and should not be dismissed as speculative. The omission of the full assessment limits scrutiny of the findings and their significance in the decision-making process.

Moreover, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these crucial impacts have not been adequately integrated into the main

application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset prevents the application from offering a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. While development should foster positive health outcomes and mitigate harm, the existing evidence points to adverse effects that remain undisclosed. Thus, without the full assessment, compliance with the requisite policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential standards of the Environmental Impact Assessment regime.

In conclusion, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts renders the assessment incomplete and unreliable, preventing a lawful determination and affirming that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented is critically flawed, failing to accurately capture the significant impacts on seascape, landscape, and visual integrity. The West Lewis coastline, characterised by its open Atlantic horizon and untouched nature, possesses a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would impose a continuous industrial presence, drastically transforming this unique character and causing an irreversible change to the landscape.

Significantly, the application does not sufficiently illustrate the extent of this visual change. The sheer scale and proximity of the turbines would overpower views from residential areas, historic landmarks, and popular coastal spots, directly diminishing visual amenity and compromising the area's intrinsic qualities of naturalness and remoteness. The assessment inadequately conveys the magnitude of this impact, which is especially concerning given the delicate nature of the landscape involved.

Methodological issues further complicate the evaluation, particularly regarding the choice and portrayal of visual viewpoints. Existing evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case

scenarios, especially in relation to important cultural heritage sites and landscapes of high value. This shortcoming raises doubts about the accuracy of the reported visual impacts, leading to an underestimation that undermines the credibility of the assessment.

Moreover, there is a notable failure to consider the interconnectedness of the landscape, seascape, and cultural heritage. Iconic sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape framework that connects them visually and spatially to the Atlantic horizon. Treating these heritage assets in isolation neglects their interdependence, resulting in a superficial understanding of the implications for their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital relationships, fundamentally altering how these heritage sites are perceived and disrupting their ties to the natural horizon. This concern extends beyond mere visual impact; it also encompasses a significant cultural and spatial harm that has not been thoroughly examined in the application.

From a policy standpoint, this proposal is at odds with the National Planning Framework 4, which aims to protect natural spaces and historic sites. The extent of the proposed changes is inconsistent with the need to maintain landscape character, visual amenity, and the settings of culturally significant areas. Additionally, the lack of a comprehensive worst-case impact assessment further discredits any assertions of policy compliance.

Ultimately, the identified impacts are such that they cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be unavoidable and dominate the landscape. This leads to a fundamental and permanent alteration that cannot be diminished to an acceptable level through any mitigation efforts.

In summary, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the intertwined nature of landscape and heritage. These substantial deficiencies preclude a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the preservation of this significant landscape.

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application is notably inadequate, lacking a thorough assessment of ecological and socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal fails to illustrate how these vital habitats and uses will be preserved or sustained without incurring significant disruption.

A major concern is the erroneous assumption that fishing activities can be relocated without repercussions. The application does not provide any evidence that alternative

fishing grounds exist, are accessible, or can accommodate additional pressure. This significant gap raises the risk of overfishing in other areas and could have far-reaching economic impacts on the local fishing fleet. In the absence of a clear, evidence-based evaluation, the effects on fisheries and community livelihoods remain obscured.

Furthermore, the project poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The extended use of high-energy hammer piling is anticipated to cause disturbance over considerable distances, impacting marine life such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting data.

There is a troubling inconsistency in the application regarding the recognition of the need for licences to permit harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises significant issues concerning adherence to 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 disturbance, noise, and fishing displacement. Without a thorough examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies stemming from the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings significantly impede a comprehensive evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project is fundamentally flawed as it treats onshore and offshore components separately, failing to recognise that they are part of a single integrated undertaking. This fragmented approach obscures the true scale of environmental and socio-economic impacts that arise from the entire project.

The onshore aspects of the proposal involve significant work, such as laying cabling across protected moorland, constructing a substation near Stornoway, and creating access routes through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is both a vital carbon store

and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, which inhibits a complete understanding of the project's environmental footprint.

Moreover, by postponing or omitting the assessment of onshore impacts, the application fails to adequately evaluate cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project elements in conjunction, yet the disjointed evaluation of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities are not fully appreciated.

There are significant threats to sensitive habitats, such as machair systems and peatland environments, which hold protective policy designations. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated or that effective avoidance measures are in place. This raises an evidential gap in relation to the protection of biodiversity.

Concerns regarding carbon balance also emerge from the proposal. The disruption of peatland can release stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application fails to adequately confront this issue or prove that the overall carbon balance is favourable.

Furthermore, routing infrastructure through active croft land could cause conflicts with existing land uses and legal rights. There is no evidence presented that necessary consents or processes have been initiated, which raises serious concerns about the deliverability and lawful execution of the project.

From a policy standpoint, the lack of an integrated assessment and the failure to ensure the protection of peatlands, habitats, and land use interests are in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated diminishes the credibility of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment. The existing assessment fails to address dark skies and nocturnal wildlife, which represents a material omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to environmental quality, cultural identity, and tourism value.

There is also a significant lack of evaluation regarding the impact of this lighting on visual amenity, landscape character, and the experience of both residents and visitors. The importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism highlights the seriousness of this omission. The failure to consider these impacts results in a considerable gap in the overall landscape and environmental assessment.

Moreover, the application does not assess how the proposed lighting may impact nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototaxis, which can lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that there has been no evaluation of how aviation lighting could affect these species or contribute to increased mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential hazard has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding ecological impacts.

Without a thorough assessment of nocturnal impacts, it is not feasible to determine whether protected species or designated sites would experience adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, thereby engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4, particularly regarding the protection of natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the overall environment.

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

SUMMARY

The 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.

Additional Comments

I object to the proposed application on a multitude of grounds. As a member of the local community that will be directly affected by this, I know the community

consultations have been inadequate and inaccessible for the majority of people locally (particularly those of working age).

Also the potential ecological impact to the area as well as potential health impacts for the local people are far too significant and under researched to risk moving forward.

People are more important than profit and the community is losing out. The structures are far too close to shore and we should not be used as Guinea pigs to see just how bad the impact will be.

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: E387EFDF

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 relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and sustainable development principles, primarily due to its scale, proximity to the shoreline, and design.

The application lacks a solid evidential basis for lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain undefined. Furthermore, the employment of a flexible design framework hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures renders any evaluation of their effectiveness impossible. Consequently, the submitted documentation does not facilitate a comprehensive understanding of the impacts on the environment, culture, or community, and assertions of negligible or non-significant effects lack robust evidential support.

There exist clear and substantive conflicts with existing policies. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly with regard to biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are directly relevant to the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability from a policy standpoint.

The unprecedented scale of the project in this location raises significant concerns, with large turbines positioned in close proximity to the shoreline, leading to apprehensions regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the lack of adequate information, dependence on undefined mitigation measures, evidential inadequacies, and clear policy non-compliance illustrate that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to provide a reliable account of the likely environmental effects of the proposed development. A flexible Project Design Envelope is employed, which does not commit to specific dimensions, layouts, or configurations of the turbines. This introduces considerable uncertainty and hinders the ability to apply a worst-case scenario consistently. As a result, the assessment's integrity is compromised, making it difficult for both the public and the competent authority to grasp the true environmental impacts of the development.

The application relies on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under these conditions means that any potential environmental harm is to be addressed at a later stage, which obstructs a meaningful evaluation of effectiveness or an assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Additionally, 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 concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are reached without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that conflicts with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be invoked, particularly regarding protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards are implemented.

In summary, the combination of an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data results in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies prevent a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The West Lewis coastline is particularly sensitive, making the proximity to shore a crucial factor in determining environmental impact. Unfortunately, the assessment of alternatives within the application is materially inadequate and does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of realistic alternatives based on

their environmental effects, the application merely recounts the project's evolution. This narrative approach fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not convincingly demonstrate that the developer has seriously considered placing turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened.

These deficiencies also extend to the evaluation of cable routing and landfall assessment, as there is inadequate evidence suggesting that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy to avoid such impacts and the insufficient comparative analysis highlight that mitigation by design has not been effectively utilised, leading to an over-reliance on post-design mitigation measures.

Consequently, the application fails to show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been sufficiently assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to deliver a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet the data gathered is incomplete and the methods used do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Notably, there is a significant oversight concerning otters, which are a European Protected Species. The application does not adequately acknowledge or evaluate their use of coastal regions for foraging and movement. This oversight of their core foraging range and behavioural patterns results in an insufficient assessment of how construction disturbance, noise, and increased activity could potentially affect them. Such deficiencies undermine any claims regarding the lack of significant effects on this

species.

The assessment of basking sharks also shows significant flaws. The reliance on aerial surveys creates a notable detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate these waters are frequently used by basking sharks. By not incorporating or properly considering this data, the assessment presents an incomplete baseline and diminishes the reliability of its conclusions.

The methodological shortcomings mean that claims of negligible or non-significant effects are based on assumptions rather than on strong evidence. The lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

Regulatory requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4 are not met by the application, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Therefore, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns related to its impact on seabird populations, particularly given its location within key foraging areas and migratory pathways on the west coast of the Isle of Lewis. This region is known to support internationally important seabird populations, many of which are already in decline. The ornithological assessment accompanying the application is fundamentally flawed, containing notable gaps in evidence and internal inconsistencies that undermine its conclusions. Notably, it fails to demonstrate, to the required evidential standard, that these species will not be adversely affected by the development.

The application exhibits a fundamental contradiction; the developer asserts there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This raises serious concerns regarding the reliability of the assessment, as the conclusions drawn do not align with the underlying evidence. Furthermore, the assessment lacks sufficient evidence regarding the potential impacts on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not adequately recognised, and the modelling

approaches employed introduce uncertainty, particularly for species that are already in severe decline, such as Kittiwakes and Fulmars.

The siting of turbines within a recognised migratory corridor significantly heightens the risk of creating a barrier for species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. From a regulatory standpoint, the application falls short of meeting the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with gaps in data and limitations of the modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts, 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 fundamentally flawed, particularly regarding the West Lewis coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. This application adopts a simplistic view, treating heritage as isolated, static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major oversight is evident in the handling of significant cultural sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they serve as active places of burial and spiritual practice. The assessment's failure to account for their continued use and meaning, along with the potential impact of development on their setting, leads to an incomplete understanding of cultural effects and ignores their essential role in community life.

Furthermore, the evaluation neglects intangible aspects of cultural heritage such as the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These components are vital to the area's identity yet are entirely overlooked in the assessment, representing a significant gap. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Community rights and engagement also raise serious concerns. The Gaelic-speaking population has a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A further procedural flaw is the absence of a compliant Island Communities Impact Assessment, required by the Islands (Scotland) Act 2018. This omission means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. Such a gap 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 places. The failure to consider both tangible and intangible heritage, along with living cultural practices, clearly deviates from policy requirements.

Overall, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment is a significant oversight that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the lack of transparency surrounding the complete report creates a substantial evidential gap. This deficiency not only inhibits the public's understanding of the risks identified but also restricts the competent authority's ability to perform a thorough evaluation of the proposal.

Summaries that are available indicate that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are grounded in direct engagement with the community and are not speculative in nature. However, without access to the full assessment, the findings cannot be adequately scrutinised, thereby limiting the determination of their significance in the decision-making process.

Moreover, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Yet these critical impacts have not been sufficiently incorporated into the main application or given the necessary weight. The decision to withhold the complete Social Impact Assessment obscures the true human and social cost associated with the development.

The lack of transparency has a detrimental effect on the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when community character and functioning may be at stake. The omission of the full dataset means that the application lacks a complete evidential basis for assessing the balance between the proposed benefits and potential harm.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to promote positive health outcomes and mitigate harm, yet the evidence presented suggests existing adverse effects that remain undisclosed. In the absence of the complete assessment, compliance with these policy objectives cannot be affirmed.

The implications of this procedural inadequacy are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This situation constitutes a failure to meet the evidential requirements mandated by the Environmental Impact Assessment framework.

In summary, the combination of non-disclosure of the full Social Impact Assessment alongside the evidence of existing adverse impacts leads to an incomplete and unreliable assessment. This situation ultimately obstructs a lawful determination and confirms that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines along the West Lewis coastline raises significant concerns regarding its impact on the local landscape, seascape, and cultural heritage. The introduction of these turbines would lead to a dominant industrial presence that fundamentally changes the area's character, known for its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This alteration to the landscape is not only substantial but also permanent and irreversible.

The visual impact of the turbines is inadequately represented in the assessment. Due to their scale and proximity to residential areas, historic sites, and popular coastal locations, the turbines would dominate views and severely impact visual amenity. This change erodes the defining qualities of naturalness and remoteness, yet the assessment fails to convey the full significance of this impact within such a sensitive landscape.

Methodological shortcomings are evident in the selection and presentation of visual viewpoints. It appears that the chosen viewpoints do not fully encapsulate the sensitivity of key cultural heritage sites and high-value landscapes. Consequently, the potential visual impact may have been understated, leading to a less reliable assessment.

Additionally, the application neglects to evaluate 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 that is visually and spatially linked to the Atlantic horizon. Treating these assets as isolated fails to acknowledge their interdependence, resulting in an inadequate evaluation of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape threatens to sever these vital connections, disrupting the context in which heritage assets are experienced. This change represents not merely a visual impact but a wider cultural and spatial harm that remains insufficiently assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which aims to protect natural places and historic assets. The significant scale of change proposed is incompatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a robust worst-case impact assessment undermines any assertion of compliance with established policies.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Thus, the changes brought about would be fundamental and permanent, beyond the scope of acceptable reduction through mitigation.

In summary, the assessment provided is inadequate in accurately portraying the scale of impact, the sensitivity of the receiving environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal cannot be reconciled with the protection of this significant landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal for substantial seabed preparation and installation works within the high-energy Atlantic environment raises significant concerns due to the incomplete assessment of construction and pollution risks. The absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans means that there is insufficient detail to evaluate the likely environmental effects. Instead, the application relies on unspecified mitigation and contingency measures that are to be prepared post-consent. This approach not only hinders the meaningful assessment of their adequacy and effectiveness but also introduces uncertainty regarding the protection of the sensitive receiving environment.

The West Lewis coastline is known for its clean coastal waters and important habitats, which are at risk of sediment disturbance and contamination. Although the application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, controlled, or monitored. Additionally, there is a lack of clarity about the scale and

behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these potential disturbances. This lack of information also extends to marine species and habitats identified as sensitive in the wider assessment.

Moreover, the failure to include detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application undermines the ability to assess whether appropriate safeguards will be in place to address pollution events. This procedural risk complicates the competent authority's ability to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation should be evaluated prior to consent; without this information, a lawful determination is not feasible. The application also does not demonstrate compliance with policies concerning environmental protection and water quality.

Ultimately, the deficiencies in defined mitigation measures, detailed management plans, and uncertainties about potential impacts render the assessment materially inadequate. These issues prevent a thorough evaluation of construction and pollution risks and highlight that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The proposal lacks a robust assessment of fisheries and marine life, failing to adequately evaluate the ecological and socio-economic impacts associated with the development. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a functioning fishing industry; however, the application does not provide assurance that these habitats and uses will be protected or maintained without significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application offers no evidence that alternative fishing grounds are available or capable of sustaining the additional pressure resulting from such displacement. This oversight is particularly concerning, as it poses a risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species, primarily due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended period is likely to cause disturbance across considerable distances, thereby affecting species including dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises

critical concerns, yet the application minimises these effects without sufficient supporting evidence.

Additionally, the application demonstrates a clear inconsistency by acknowledging 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 serious concerns about compliance with the Habitats Regulations, particularly where harm is anticipated to the extent requiring legal authorisation.

Moreover, the assessment does not take into account the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which prevents any determination that the proposal represents sustainable development.

In summary, the deficiencies relating to the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is incomplete and fails to address the full range of impacts from what constitutes a single integrated project. While the offshore turbines and onshore works are inherently connected, they are assessed separately. This fragmented approach obscures the true extent of environmental and socio-economic effects.

Included in the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. The proposed works involve excavating areas of deep peat, particularly in Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application does not include a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the distinct assessment of offshore and onshore elements means that the

combined impacts on peatlands, habitats, and communities are not fully appreciated.

There are serious risks to sensitive habitats, such as machair systems and peatland environments, which have policy protection. The application fails to show that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been implemented. This highlights a significant gap in terms of biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbing peatland releases stored carbon, which could create a carbon debt that runs counter to the aims of renewable energy initiatives. The application does not sufficiently address this concern or prove that the overall carbon balance is beneficial.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or procedures have been started, leading to questions about its deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" across the western horizon. This would fundamentally alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are important for environmental quality, cultural identity, and tourism value.

The application fails to assess the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This is particularly significant given the area's reliance on dark skies, which are vital for emerging sectors such as astro-tourism. The lack of consideration for these impacts creates a notable gap in the environmental assessment.

There is also no evaluation of the impacts on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not include any lighting impact assessment or phototaxis study to determine how the aviation lighting may affect these species or increase

mortality.

Furthermore, the ornithological assessment relies on daytime survey data, which fails to account for nocturnal activity or associated risks. Kittiwakes, for instance, which may forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data leads to a significant gap in understanding ecological impacts.

Without assessing 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 achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4, which aims to protect natural places and uphold environmental quality. This oversight also weakens the overall analysis of landscape and seascape impacts, as night-time character is a crucial aspect of the environment.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the key concerns that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. Notably, this current application is submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

The evidential foundation for the proposal is neither complete nor dependable. There are significant gaps in baseline data, an undefined design envelope is being utilised, and there is reliance on unspecified mitigation measures. Moreover, critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism, have been omitted. As a result, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Clear procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4 by failing to demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It does not show 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. Additionally, 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.

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and 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, the loss of dark skies, the disruption of cultural and visual connections, and impacts on tourism represent permanent changes that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively unfit for determination. The scale of deficiencies in information, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or activate the relevant regulatory measures to obtain 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

As a frequent visitor to Lewis and Harris I object to the proposed wind farm project. Myriad reasons abound, which are argued by people better placed than me, for my objection. However while I understand the need for power production all brownfield sites must be used first. Power waste age must be addressed first. Wild places are shrinking and it's wholly unacceptable that offshore wind farms are being proposed. There is not enough evidence in my opinion that irreparable damage will not occur. Proposals similar to this have been rejected by the Republic of Ireland and for good reason.

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: 02C90D19

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 frameworks. A review of the Environmental Impact Assessment Report and its accompanying documentation has revealed serious deficiencies in material planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, proximity, and scale of the proposal raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation for a lawful decision. There is a critical absence of environmental data, while the baseline information provided is both limited and inconsistent. Important aspects of the proposal are still undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal presents clear and substantial conflicts with established policy. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The scale of the proposal is unprecedented for this location, with large turbines positioned very close to the shoreline, raising serious concerns related to landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and does not support a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks sufficient detail and fails to offer a comprehensive, transparent, or dependable evaluation of the anticipated environmental impacts associated with the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of commitment undermines the assessment's integrity and leads to potential discrepancies between the impacts reported and the actual development constructed. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

Furthermore, the application places considerable emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed later obstructs any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferral of crucial information to stages following consent is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation prior to decision-making.

Additionally, the application is marred by notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This situation leads to uncertainty concerning the scale and significance of impacts, particularly where negligible or non-significant effects are posited without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential standards required under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, as it is unable to prove that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the existing gaps in baseline data together render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, thus leaving the competent authority without adequate information to make a well-informed determination of the application.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a thorough comparison of realistic alternatives based on their environmental effects, it presents a narrative describing the evolution of the project.

This method does not adequately demonstrate that less harmful options have been properly identified, evaluated, and chosen over more damaging ones.

There is a notable lack of a transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously contemplated placing the turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in assessing impacts, the absence of such an analysis hinders any conclusion that the proposed siting is the least harmful option available.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors. Such receptors include culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that there has been no application of mitigation by design, with a reliance instead on measures to be taken post-design.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This is indicative of a failure to adhere to the established mitigation hierarchy, which in turn prevents the competent authority from understanding whether less harmful and more suitable alternatives exist. In the absence of a comprehensive assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment represents a material 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 application demonstrates significant deficiencies in the assessment of marine ecology and protected species, particularly concerning its understanding of ecological receptors in the sensitive and biologically active environment of West Lewis coastal waters. The methodologies employed are inadequate, leading to an incomplete baseline that fails to capture crucial details such as species presence, behaviour, and habitat use.

Notably, the assessment neglects to properly recognise otters, a European Protected Species, in their active utilisation of coastal areas for foraging and movement. This oversight extends to an inadequate consideration of their core foraging range and behavioural patterns, resulting in an insufficient evaluation of potential impacts from

construction disturbances, noise, and increased human activity. Consequently, the assessment's conclusions regarding the absence of significant effects on otters lack a solid evidential basis.

Further issues arise in the evaluation of basking sharks, where the reliance on aerial surveys leads to a substantial detection bias, particularly in the challenging conditions of the Atlantic. This method is prone to underestimating the presence of basking sharks when juxtaposed with well-documented land-based observations that demonstrate their frequent use of these waters. The failure to adequately incorporate or consider such pertinent data results in an incomplete baseline and undermines the validity of the conclusions drawn.

These methodological shortcomings result in determinations of negligible or non-significant effects that rely more on assumptions than on robust evidence. Additionally, the lack of comprehensive baseline data hinders meaningful assessments of cumulative and indirect impacts, including variations due to seasonal changes and broader ecosystem interactions. This uncertainty raises concerns about the true risks faced by marine species and their habitats.

From a regulatory standpoint, the application does not align with the stipulations of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the exclusion of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Thus, the issuance of consent cannot be justified within the legal framework.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions collectively renders the assessment unreliable. These shortcomings impede a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application is unsupported by a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A notable inconsistency arises from the developer's assertion of no significant adverse effects alongside the advancement of a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This contradiction raises questions regarding the assessment's reliability and suggests that the conclusions drawn lack robust support from the underlying evidence. Moreover, the assessment

does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The crucial nature of these feeding grounds is insufficiently acknowledged, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Given that baseline data is often incomplete and behavioural responses remain poorly understood, the methodologies employed are likely to underestimate potential mortality rates.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application has significant shortcomings regarding the assessment of community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has taken place. 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, the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These sites are active places for burial and spiritual practice, yet they are inaccurately categorised as static features. This mischaracterisation fails to acknowledge their ongoing use and meaning, as well as the potential impact of development on their setting. Consequently, this results in an inadequate evaluation of cultural effects and neglects their importance in community life.

The assessment of cultural heritage and community identity is fundamentally lacking and fails to recognise the West Lewis coastline as a living cultural landscape. It overlooks the intrinsic connections between environment, language, tradition, and community. By adopting a reductive approach, the application treats heritage as a series of isolated, static assets, ignoring their social, cultural, and spiritual functions within the community.

Additionally, the application neglects to assess intangible cultural heritage, such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are vital to the area's identity but are absent from the assessment, representing a significant omission. Without considering these factors, the true cultural impact of the development remains unexamined.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This absence alone is sufficient to impede a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment commissioned by the developer represents a significant evidential gap in the planning application. This gap hinders the public and competent authorities from understanding the full extent of social risks identified through the developer's own research. Summaries suggest that local residents are already experiencing measurable levels of stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community and are therefore factual rather than speculative. However, without access to the complete assessment, there is insufficient scrutiny of the findings, which limits the determination of their significance in the decision-making process.

Furthermore, evidence indicates that the proposal threatens community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Despite the recognition of these impacts, they have not been fully integrated into the main

application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development, which is crucial information for stakeholders.

The absence of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of the social, economic, and health impacts is essential for developments of this nature, particularly when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a comprehensive evidential basis required to assess the balance between the proposed benefits and potential harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and to avoid causing harm, yet the available evidence highlights existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to verify adherence to this policy.

The procedural ramifications of this non-disclosure are significant. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a material shortcoming in the application and represents a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the lack of disclosure regarding the full Social Impact Assessment, coupled with documented 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 does not possess sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment in West Lewis. Characterised by its open Atlantic horizon and undeveloped nature, the coastline conveys a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would create an ongoing and overwhelming industrial presence, which would fundamentally alter this character and result in a permanent and irreversible transformation of the landscape.

The application fails to accurately represent the scale of this visual change. Given their size and proximity, the turbines would dominate the views from residential areas, historic sites, and well-frequented coastal locations. Such dominance would directly impact visual amenity and undermine the defining qualities of naturalness and remoteness. The assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual

viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This situation raises the possibility that the magnitude of the visual impact has been understated, thus compromising the assessment's reliability.

Another notable deficiency is the failure to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked visually and spatially to the Atlantic horizon. The assessment considers these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, altering how heritage assets are perceived and disrupting their links to the natural horizon. This transformation represents not merely a visual impact but a wider cultural and spatial harm that has not been properly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural places and historical assets. The magnitude of change is incompatible with the need 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 compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The size, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than being reducible to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works set against a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking, failing to deliver the necessary detail to evaluate likely 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 prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean

coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these risks will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent stage, the application inhibits the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. Likely significant effects and mitigation strategies must be evaluated prior to consent, and when this information is absent, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts contribute to 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 assessment concerning fisheries and marine life lacks the necessary detail and fails to provide a thorough evaluation of the ecological or socio-economic impacts associated with the proposal. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a significant fishing industry. However, the application does not sufficiently demonstrate how these uses and habitats can be preserved or maintained without causing considerable disruption.

One major concern is the assumption made within the application that fishing activity can be displaced without any repercussions. There is a lack of evidence supporting the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional pressure that such displacement would create. This oversight is critical, as it poses risks of overfishing in other locations and may have broader economic ramifications for the local fishing fleet. A clear and evidence-based assessment is essential for understanding the potential 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 produced during construction activities. The use of high-energy hammer piling over a prolonged duration is expected to disturb a wide area, affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population is a serious issue; however, the application minimizes the importance of these effects without adequate supporting evidence.

In addition, the application reveals a notable inconsistency. While it acknowledges the requirement for licences to allow harm to European Protected Species, it simultaneously describes the anticipated impacts as negligible. This contradiction raises doubts about the reliability of the assessment and brings into question its adherence to the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

The assessment further neglects to consider cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, thus hindering any conclusion regarding the sustainability of the proposal.

Overall, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment contribute to an incomplete and unreliable evaluation. These shortcomings prevent a comprehensive understanding of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises several concerns regarding the integrity of its environmental assessments. The assessment of onshore infrastructure is incomplete, failing to consider the full impacts of what is a single integrated project. The offshore turbines and onshore works are linked, yet they are evaluated separately, leading to a fragmented approach that obscures the overall environmental and socio-economic effects.

Significant risks to sensitive habitats are evident. The onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically sensitive habitat. The lack of a comprehensive impact

assessment prevents a thorough understanding of the project's environmental footprint.

Moreover, the application does not adequately address the carbon balance. Disturbing peatland releases stored carbon, which may create a carbon debt that contradicts renewable energy objectives. The proposal has not shown that the overall carbon balance remains beneficial.

In addition, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising concerns about deliverability and lawful implementation.

From a policy perspective, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The separation of offshore and onshore elements leads to a failure in evaluating cumulative effects, meaning that the combined impacts on peatlands, habitats, and communities are not fully understood.

Taken together, these issues indicate a significant evidential gap regarding biodiversity protection and overall environmental impacts. The separation of project components, absence of comprehensive assessment, and lack of evidence on land use impacts render this part of the application incomplete and unreliable, preventing lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism appeal. The proposed introduction of permanent red aviation lighting, which will be visible over substantial distances, is expected to create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

There is a notable lack of analysis regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly relevant given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to evaluate these impacts reveals a considerable gap in the comprehensive landscape and environmental assessment.

Additionally, there is no examination of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can result in disorientation and heightened risks of collision. The application has not included any assessment related to lighting impacts

or phototaxis studies, thereby neglecting to evaluate how aviation lighting may adversely affect these species or contribute to increased mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to address nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential threat has not been evaluated. The lack of site-specific night-time data creates a critical void in understanding the ecological impacts involved.

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

From a policy perspective, this omission is at odds with National Planning Framework 4, which pertains to the safeguarding of natural places and the preservation of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, given that night-time character is a vital aspect of the environment.

In conclusion, the complete lack of assessment regarding dark skies and nocturnal wildlife results in 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 related to the development proposal is inadequate and does not evaluate the economic and social effects on a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which relies heavily on these natural features. The application acknowledges that 86% of visitors are attracted by the scenery, but it fails to provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced notable growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and potential decline in environmental quality might impact Tourism Gross Value Added or the broader economic resilience of the region. This lack of analysis makes it impossible to assess whether the development would yield a net economic benefit or harm a sector that is both established and expanding.

Furthermore, the assessment neglects the significance of environmental quality in promoting tourism, particularly the value of unspoiled landscapes and dark skies for

visitor experiences, as well as the rising interest in nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, resulting in a crucial gap in understanding the potential impacts on a recognised and developing segment of the local economy.

For an island community with limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been analysed as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show compliance with National Planning Framework 4, particularly concerning economic impacts and the need to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic dependence create a significant evidential gap. This gap hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the requirements for sustainable development as defined by statutory obligations, national policies, and evidential standards. It reflects the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current proposal is presented under a more rigorous policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is an evident lack of a complete and reliable evidential basis for the determination of this application. Significant gaps exist in baseline data, and the application continues to employ an undefined design envelope. It relies on unspecified mitigation measures and omits critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are also apparent. 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 fully disclose the Social Impact Assessment is 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 unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not adequately protect biodiversity, natural habitats, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of offshore and onshore components have not been sufficiently assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

There remain uncertainties and potential significance regarding environmental risks. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to 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.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 40F173CA

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 for consideration under the appropriate marine licensing and Environmental Impact Assessment frameworks. The basis for this objection arises from a thorough review of the Environmental Impact Assessment Report and its accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, nearly untouched environment, and a strong sense of cultural identity. The dimensions, proximity, and design of the proposed wind farm raise critical questions about its alignment with statutory obligations, national policy guidelines, and the principles underlying sustainable development.

The application notably lacks a solid evidential foundation necessary for a lawful decision. Essential environmental data has not been provided, and the baseline information available is both limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The employment of a flexible design framework obscures the assessment of potential significant effects, and the proposed mitigation measures remain unspecified, rendering it impossible to evaluate their efficacy. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidential support.

Furthermore, there are significant and clear conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for obtaining consent and compromise the capacity of the competent authority to determine the acceptability of the development from a policy standpoint.

The unprecedented scale of this proposal in the given location, featuring large turbines in close proximity to the shoreline, raises substantial concerns regarding landscape capacity, visual impact, and overall environmental consequences. In summary, the combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy underscores that the application is incomplete and unable to substantiate a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal relies on an Environmental Impact Assessment Report that is materially deficient, failing to deliver a full, transparent, or reliable account of the likely environmental effects. A flexible Project Design Envelope has been employed, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and obstructs the consistent application of a worst-case scenario, ultimately undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that is ultimately constructed, leaving both the public and the competent authority unable to grasp the true extent of environmental effects.

Significantly, the application depends heavily on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Consent is sought under the premise that environmental harm will be addressed later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and fundamentally contradicts the purpose of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to determination.

The report is further compromised by considerable evidential deficiencies, such as gaps in baseline data and limitations in methodology, along with a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This raises concerns in relation to 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 remains unproven that impacts have been fully assessed or that appropriate safeguards are in place.

In conclusion, the dependence on an undefined design envelope, the absence of specified mitigation, and the existing gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and robust assessment of environmental effects and indicate that the competent authority lacks the necessary information to determine the application effectively.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a thorough assessment of alternatives, which is a significant shortcoming under the Environmental Impact Assessment regime. Instead of offering a clear and reasoned comparison of realistic alternatives based on their environmental impacts, the application merely recounts the project's evolution. This narrative approach does not prove that less harmful options were properly identified, evaluated, and selected over more damaging ones.

Additionally, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where impacts related to visual, ecological, and coastal factors would likely be diminished. The sensitive nature of the West Lewis coastline and the critical importance of proximity to the shore in assessing impact highlight the inadequacy of the analysis provided, preventing any conclusions that the proposed siting is the least damaging option available.

These issues extend to the analysis of cable routing and landfall, with insufficient evidence presented that alternative routes were adequately explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signals that mitigation by design has not been prioritised, instead relying on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This oversight represents 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 are available. Without a rigorous assessment of alternatives, it cannot be concluded that the proposal offers a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment 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 application fails to present a thorough assessment of marine ecology and protected species, resulting in a lack of a complete and reliable understanding of ecological receptors within the West Lewis coastal environment. This area is noted for its high sensitivity and biological activity; however, the baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant gap in the assessment concerns otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal regions for foraging and movement. The neglect of their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts arising from construction disturbance, noise, and heightened activity. This oversight undermines the conclusions regarding the absence of significant effects on this species.

Further issues are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. Such an approach likely underestimates their presence, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to incorporate or adequately consider this data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws result in findings of negligible or non-significant effects that are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these shortcomings precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development raises significant concerns due to its flawed ornithological assessment. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already declining, yet the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are located in the development zone, yet the assessment fails to evaluate crucial factors such as displacement, collision risk, or habitat loss in a thorough manner.

There is a notable contradiction in the application, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This

inconsistency undermines the credibility of the assessment, revealing that the conclusions drawn are not supported by the necessary evidence.

Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds associated with protected sites like the Lewis Peatlands and St Kilda. The critical importance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches creates uncertainty, especially for species in severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality due to incomplete baseline data and inadequate understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor presents a considerable risk, potentially obstructing a primary flight path used by species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and the potential effects on species with limited global populations are not adequately addressed in the application.

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

Overall, the deficiencies highlighted represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally significant 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 internal inconsistencies, methodological flaws, and a lack of sufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application is fundamentally flawed in its assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The evaluation adopts a simplistic view, treating heritage merely as a collection of 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 for burial and spiritual practices, yet the assessment mistakenly categorises them as static features, disregarding their continued use and meaning as well as the impact of development on their surroundings. This mischaracterisation leads to an incomplete

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

Moreover, the assessment neglects intangible cultural heritage, such as the Gaelic language, traditions, and the longstanding relationship the community maintains with the coastal environment. These factors are vital to the area's identity and are not addressed in the assessment, representing a significant oversight. The cultural impact of the development, therefore, cannot be comprehensively evaluated without consideration of these elements.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population is recognised as having a distinct cultural identity characteristic of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement diminishes the legitimacy of the assessment and contravenes established principles of participation regarding decisions that affect cultural and environmental interests.

A major procedural oversight 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 fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination of the application.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a clear deviation from policy requirements.

Overall, the lack of assessment regarding living heritage, intangible cultural value, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence creates a notable evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full scope of social risks highlighted in the developer's research.

Summaries that are available reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are therefore not mere speculation. Nonetheless, the lack of disclosure of the complete assessment

limits proper scrutiny and undermines the significance of these findings in the decision-making process.

The proposal is also viewed as a threat to community identity and cohesion, with findings indicating “cultural loss” identified in the developer’s own research. Despite these critical insights, they have not been sufficiently integrated into the main application or given the weight they deserve. The decision to withhold the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, particularly in relation to community character and functioning. Without the complete dataset, the application fails to provide an adequate evidential basis to assess the balance between potential benefits and harm.

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

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the full 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 non-disclosure of the complete Social Impact Assessment, coupled with evidence of pre-existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and emphasises that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

sensitive landscape.

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

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

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment seriously undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking in detail, making it impossible to properly evaluate likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures to be created after consent, which hampers any meaningful assessment of their potential adequacy or effectiveness.

This approach raises serious concerns, particularly considering 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 accidental chemical or oil spills, it fails to provide adequate information on how these issues will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures adds to the risks involved. By postponing the planning of contingency measures until after consent is granted, the application obstructs any evaluation of whether adequate safeguards are in place for responding to pollution incidents. This not only introduces procedural risks but also undermines the competent authority's ability to assess environmental protection measures during the decision-making process.

Regulatory requirements mandate that significant effects and mitigation must be thoroughly assessed prior to granting consent, and the deferral of critical environmental safeguards contradicts these requirements. The application does not demonstrate compliance with policies regarding environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainties about potential impacts render the assessment materially deficient. These issues inhibit a robust evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The concerns regarding the assessment of fisheries and marine life highlight significant shortcomings in evaluating ecological and socio-economic impacts. The West Lewis coast is home to a rich marine ecosystem and supports an active fishing industry. However, the proposal does not adequately ensure the protection or maintenance of these vital habitats and activities, raising serious concerns about potential disruptions.

A major flaw in the application is the erroneous assumption that fishing activities can be easily displaced without negative effects. There is no supporting evidence indicating that alternative fishing grounds are available or capable of sustaining increased pressure. This lack of consideration is crucial, as it risks overfishing in other areas and may lead to broader economic repercussions for the local fishing community. The absence of a clear and substantiated assessment inhibits a proper understanding of

the impacts on fisheries and local livelihoods.

Moreover, the potential risks to marine species, especially due to construction-related underwater noise, are of great concern. The expected high-energy hammer piling over a prolonged period poses disturbances that could affect marine life, including the local bottlenose dolphin population. Despite the predicted significant disruption, the application downplays these potential effects and fails to provide adequate supporting evidence for its claims.

There exists a troubling inconsistency in the application, acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction not only undermines the credibility of the assessment but also raises significant questions regarding adherence to the Habitats Regulations, especially in instances where anticipated harm necessitates legal approval.

Additionally, the application does not address cumulative impacts stemming from various pressures like habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic fabric of the area.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, casting doubt on the notion that this proposal aligns with sustainable development principles.

In summary, the gaps in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application collectively render the assessment incomplete and unreliable. These issues obstruct a comprehensive 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 Environmental Impact Assessment fails to include an evaluation of dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon and fundamentally transforming the night-time environment.

This proposal lacks an assessment of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, which is particularly concerning given the importance of dark skies to the region's identity and to the growth of sectors such as astro-tourism. The absence of consideration for these impacts indicates a clear gap in the overall landscape and environmental analysis.

Moreover, the application does not evaluate the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel,

are particularly vulnerable to artificial lighting due to their sensitivity to phototaxis, which can cause disorientation and increase the risk of collisions. Without a lighting impact assessment or a study on phototaxis, the application fails to determine 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 further exacerbates this oversight, as it does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential impact has gone unassessed. The lack of site-specific data regarding night-time activity creates a critical gap in understanding the ecological impacts of the proposal.

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 standard of evidence required to exclude adverse effects beyond reasonable scientific doubt is not met, thus necessitating the precautionary principle and impeding a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4's objectives concerning the protection of natural places and environmental quality. Additionally, they undermine the comprehensive evaluation of landscape and seascape impacts since the character of the night-time environment is a vital aspect of the ecosystem.

In summary, the lack of any assessment regarding 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 unsuitable for a lawful determination.

TOURISM

The assessment of tourism impacts associated with the proposed development is severely inadequate and neglects to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the area's wild coastline, near-pristine landscape, dark skies, and its sense of remoteness. Although the application recognises that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Since 2017, tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million to over £81.5 million, supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Despite this significant increase, the application does not model the potential impacts of seascape industrialisation and the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it remains impossible to ascertain whether

the proposed development would yield a net economic benefit or jeopardise an established and flourishing sector.

Moreover, the evaluation neglects to take into account the essential role of environmental quality in sustaining tourism, including the critical importance of unspoiled landscapes and dark skies to enhance visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a notable gap in understanding the impacts on a recognised and expanding part of the local economy.

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 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 illustrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependencies results in a considerable evidential void. This deficiency hampers a comprehensive 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 embodies a critical shortfall in fulfilling the principles of sustainable development as mandated by statutory duties and national policy. This application echoes the fundamental issues that prompted the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, it is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

The evidential basis provided in the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope persists. There is an overreliance on unspecified mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are overlooked. Consequently, the Environmental Impact Assessment remains unfinished, hindering a comprehensive understanding of significant effects and residual impacts.

Moreover, clear procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands

(Scotland) Act 2018, while failing to disclose a full Social Impact Assessment constitutes a serious omission. These failings inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct contradiction to National Planning Framework 4, as it does not demonstrate the necessary protection for biodiversity, natural spaces, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are significant and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

In conclusion, the application is procedurally and substantively unsuitable for determination. The multitude of information gaps, in conjunction with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or activate the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

Please stop this wanton destruction of our beautiful Country of Scotland.

Scotland already produces enough energy we don't need anymore.

If this this project is allowed to go ahead, more Wind Turbines will be built along with sub stations battery storage stations and fields of solar panels all of which will spoil an exceptionally beautiful area destroy the lives of the people who live there, decimate tourism and destroy local business, the area will become an Industrial wasteland.

The visual impact of wind farms is enormous you can see them for miles. I live beside

the North Sea another area being blighted by 'Green Energy', the impact of these turbines and associated infrastructure is enormous, once they are built the beauty of the area is gone forever.

There is also concern about wildlife, many birds fly into these turbines, as well as the damage they are doing to the seabed and marine life.

The movement of large vehicles on small roads, the disruption to the population, the destruction to peat bogs, the destruction of woodland, the destruction to wildlife as their habitat is destroyed or they are killed by large machinery.

The light pollution will increase especially when sub stations are built the lighting is very bright around this infrastructure.

Offshore wind farms will require underground cables to bring the power onshore, the water around them is warmer which will cause marine damage there is also a possibility that this affects the way dolphins, whales and porpoise react which could be the reason for more mass groundings on beaches.

Many areas rely on Tourism for local business to survive, if these pylons get the go ahead tourism will be impacted this could lead to the closure of businesses and more unemployment in the area leading to people leaving the area.

There are no local benefits from 'Green Energy' there is only upset and destruction. It is time for a moratorium to be held on these projects and a more cohesive plan put in place with tighter building regulations to curtail these massive projects or Bonnie Scotland will cease to exist and just be an Industrial wasteland .

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: F6DA187E

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 is submitted under relevant marine licensing and Environmental Impact Assessment regimes. The application raises significant concerns related to planning, environmental, cultural, and procedural matters, as identified in a review of the Environmental Impact Assessment Report and associated documents. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application lacks a solid evidential basis necessary for a lawful determination. There is missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework used hinders a clear understanding of potential significant effects, and the unsubstantiated reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and significant. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency pertains particularly to biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements regarding the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests required for consent and weaken the capacity of the competent authority to determine that the development aligns with policy requirements.

The unprecedented scale of the proposal raises further concerns, with large turbines located close to the shoreline. This positioning creates significant issues relating to landscape capacity, visual dominance, and environmental impact. Overall, the combination of insufficient information, undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and does not support a lawful determination. In light of these factors, the precautionary principle should apply.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured, evidence-based assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of a thorough comparison of realistic alternatives based on their environmental effects, it offers a narrative account

of the project's evolution. This method does not sufficiently demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

The lack of transparency in evaluating alternative offshore locations, development scales, or design configurations is evident. The developer has not shown that they have meaningfully considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact, the absence of such analysis hinders any conclusion that the proposed siting represents the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly investigated to avoid or reduce 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 the application does not employ mitigation by design, instead relying on post-design measures.

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

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the proposed development is fundamentally flawed, lacking a comprehensive and trustworthy understanding of ecological receptors within the West Lewis coastal environment. This region is characterised as a biologically active and sensitive marine ecosystem, yet the baseline data provided is inadequate, and the methodologies employed do not sufficiently capture critical aspects of species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a sound evidential basis for the evaluation of potential impacts.

A significant oversight in the application pertains to otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their active utilisation of coastal regions for foraging and movement. The omission of key

information regarding their core foraging areas and behavioural patterns leads to an insufficient assessment of the possible impacts from construction disturbances, noise, and heightened activity levels. This gap undermines the validity of any claims regarding the absence of significant effects on this species.

Moreover, the assessment's shortcomings extend to basking sharks, where reliance on aerial surveys results in a notable detection bias, particularly under Atlantic conditions. This methodological choice is likely to lead to an underestimation of their presence, especially when compared with established land-based observations that demonstrate their frequent utilisation of these waters. The failure to adequately incorporate or evaluate such evidence contributes to an incomplete baseline, thereby diminishing the reliability of the conclusions drawn.

These methodological shortcomings imply that the assertions of negligible or non-significant effects are predicated on assumptions rather than substantiated evidence. The lack of sufficient baseline data precludes a meaningful assessment of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This situation generates uncertainty concerning the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not conform to the mandates of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been duly identified or assessed. The uncertainty introduced by these deficiencies obstructs the ability to exclude adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it would be unlawful to grant consent.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsupported conclusions culminates in an unreliable assessment. These critical deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the overall determination that the application lacks a sufficient 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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment is a serious concern that compromises the integrity of the application. The developer conducted focus groups with local residents as part of the assessment, yet the full report has not been made available. This lack of transparency creates a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate the social risks that have been identified.

Available summaries indicate that local residents are already experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These documented impacts arise from direct engagement and therefore should not be viewed as speculative. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal poses a threat to community identity and cohesion, with the developer's own findings indicating a risk of "cultural loss." Despite this, these identified impacts have not been adequately incorporated into the main application or given the necessary weight in the assessment. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset means that the application fails to provide a comprehensive evidential basis for balancing benefits against potential harm.

From a policy standpoint, the application does not appear to comply with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and avoid negative impacts, yet the evidence suggests that adverse effects are already present and have not been fully disclosed. Without the complete assessment, the demonstration of compliance with this policy is unsubstantiated.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a material flaw within the application and fails to meet the evidential requirements outlined in the Environmental Impact Assessment framework.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline presents a range of significant deficiencies in its assessment of seascape, landscape, and visual impacts. This area is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of such industrial elements in close proximity to the shoreline would result in a dominant presence that fundamentally transforms this character, leading to irreversible changes to the landscape.

A key issue is the inadequate representation of the visual impact of these turbines. Their scale and proximity threaten to dominate views from various residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and compromising the essential qualities of naturalness and remoteness. The current assessment does not convey the true extent or significance of this impact within the context of a sensitive landscape.

Moreover, there are serious methodological concerns regarding the choice and presentation of visual viewpoints. The evidence indicates that these viewpoints may not fully account for the most sensitive receptors or depict worst-case scenarios, particularly concerning vital cultural heritage sites and high-value landscapes. This oversight raises doubts about the accuracy of the stated visual impact and undermines the assessment's overall reliability.

Additionally, the application neglects to evaluate the interconnections between landscape, seascape, and cultural heritage comprehensively. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are not viewed in the context of their wider landscape setting and visual relationships with the Atlantic horizon. Instead, they are treated as isolated entities, leading to an incomplete assessment of the impacts on their setting and cultural significance.

The proposed industrialisation would sever the connections that define these heritage assets, fundamentally altering the context in which they are experienced and disrupting their relationship with the natural horizon. This not only represents a visual impact but also indicates broader cultural and spatial harm that remains unassessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The scale of change presented is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment weakens any assertions of policy compliance.

Ultimately, the identified impacts are such that they cannot be effectively mitigated. The scale, height, and proximity of the turbines would render their presence overwhelming and unavoidable. Thus, the changes introduced are fundamental and permanent, incapable of being reduced to acceptable levels through any mitigation measures.

In summary, the overall assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and firmly support the conclusion that the proposal is incompatible with the necessary protections for 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 waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application does not adequately protect these vital resources from significant disruption. A critical concern is the presumption that fishing activities can simply be moved without repercussions. The proposal lacks evidence regarding the availability and accessibility of alternative fishing grounds capable of absorbing the additional pressure, which raises serious concerns about the potential for overfishing in other areas and the broader economic implications for the local fishing fleet. Without a thorough assessment grounded in evidence, the effects on local fisheries and livelihoods cannot be fully understood.

Moreover, there are considerable risks posed to marine species, particularly due to the underwater noise resulting from construction activities. The use of high-energy hammer piling over extended periods is expected to disturb marine life across significant distances, notably impacting species such as dolphins. The anticipated disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application significantly downplays these effects without adequate supporting evidence.

The application reveals an inconsistency by acknowledging the necessity for licences to permit 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 anticipated to a level 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. Without a comprehensive review of these combined effects, it is impossible to gauge the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not illustrate how the proposed development can coexist with existing marine users or avoid adverse effects on marine biodiversity, which precludes any assertion that the proposal aligns with the principles of sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include an evaluation of dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is renowned for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon and fundamentally transforming the night-time environment.

This proposal lacks an assessment of the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, which is particularly concerning given the importance of dark skies to the region's identity and to the growth of sectors such as astro-tourism. The absence of consideration for these impacts indicates a clear gap in the overall landscape and environmental analysis.

Moreover, the application does not evaluate the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are particularly vulnerable to artificial lighting due to their sensitivity to phototaxis, which can cause disorientation and increase the risk of collisions. Without a lighting impact assessment or a study on phototaxis, the application fails to determine 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 further exacerbates this oversight, as it does not account for nocturnal activity or the associated risks. Species such as Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential impact has gone unassessed. The lack of site-specific data regarding night-time activity creates a critical gap in understanding the ecological impacts of the proposal.

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 standard of evidence required to exclude adverse effects beyond reasonable scientific doubt is not met, thus necessitating the precautionary principle and impeding a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4's objectives concerning the protection of natural places and environmental quality. Additionally, they undermine the comprehensive evaluation of landscape and seascape impacts since the character of the night-time environment is a vital aspect of the ecosystem.

In summary, the lack of any assessment regarding 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 unsuitable for a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the standards for sustainable development, as evaluated against legal obligations, national policy, and evidential criteria. This application repeats fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. It is now being submitted under a more robust policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis needed for a proper assessment of the application. It lacks comprehensive baseline data, continues to employ an undefined design envelope, depends on unspecified mitigation measures, and omits key impact pathways such as those concerning nocturnal wildlife, full onshore infrastructure, and tourism consequences. This results in an incomplete Environmental Impact

Assessment, which fails to provide a full understanding of the likely significant effects or residual impacts.

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

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

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

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

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. The competent authority should refuse consent on these bases or invoke relevant regulatory provisions to obtain the required missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

No more littering of Scotland, of our planet - destroying lives, both of sea and land.

It's time the human race cut back on its consumerism lifestyle, infecting every space; air, mountains, beaches, its seas and deep into the earth's heart - the earth from which our life support emerges - all because of filthy greed.

The last thing we need are large turbines that WILL harm life on this earth, either directly or indirectly.

Directly by killing birds, mammals, insects and ocean creatures, and indirectly by the depths of depression that they will inflict on people. People who live in the local community, people of Scotland and people of the world.

Because we cannot survive in a world that cannot be protected against greed.

Where or when does it stop. Where is the freedom..

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: 57DD3FF8

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, highlighting 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 distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of the proposal, along with its proximity to the shoreline, raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis to support a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and several key aspects of the proposal remain undefined. Furthermore, the use of a flexible design framework obstructs a clear understanding of the likely significant effects of the development. The reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the potential environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly relate to the statutory tests required for consent and compromise the competent authority's ability to conclude that the development is acceptable within a policy context.

The unprecedented scale of this proposal introduces large turbines in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Overall, the combination of inadequate information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, failing to deliver a comprehensive and trustworthy understanding of ecological receptors within the West Lewis coastal environment. This marine system is particularly sensitive and biologically active, yet the baseline data remains incomplete. The methodologies employed do not sufficiently capture essential aspects such as species presence, behaviour, and habitat use. Consequently, the assessment does not establish a solid evidential foundation for evaluating potential impacts.

One critical gap is the assessment related to otters, which are classified as a European Protected Species. The application does not adequately recognise or evaluate their active utilisation of coastal areas for foraging and movement. The oversight concerning their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This deficiency undermines any conclusions drawn regarding the absence of significant effects on otters.

Additional shortcomings are evident in the evaluation of basking sharks. The dependence on aerial surveys introduces a significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider relevant data results in an incomplete baseline, further compromising the reliability of the conclusions presented.

These methodological weaknesses culminate in conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty surrounding the true 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, given that protected species have not been properly identified or evaluated. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents several significant constraints and sensitivities that undermine the validity of the ornithological assessment. It contains material flaws,

evidenced by notable gaps and internal inconsistencies, which raise serious doubts about its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are currently experiencing decline. However, the assessment does not convincingly demonstrate, to the required evidential standard, that these species will remain unaffected by the proposed development. This proposal is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately address the implications related to displacement, collision risk, or habitat loss.

Additionally, the application exhibits a fundamental contradiction. The developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency casts further doubt on the reliability of the assessment, indicating that its conclusions are not backed by the necessary evidence. The assessment falls short in providing adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The importance of these feeding grounds is insufficiently recognised, and the reliance on modelling methods introduces uncertainty, particularly for species experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, especially given that baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor poses additional significant risks, as it effectively creates a barrier along a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of continued mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is another concern; the application fails to meet the evidential threshold necessary to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, paired with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders the conclusion supporting consent unlawful.

The identified deficiencies also signify a breach of the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy.

In summary, the assessment's internal inconsistencies, methodological flaws, and lack of sufficient evidence render it unreliable. These shortcomings hinder 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 proposed application fails to adequately assess the cultural heritage and community identity associated with the West Lewis coastline. This region should be regarded as a living cultural landscape where environment, language, tradition, and community are deeply interconnected. Instead, the application adopts a reductive view, treating heritage as a collection of isolated, static assets while 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 are actively used for burial and spiritual practices, yet the assessment categorises them as static features. This approach fails to account for their continued use and meaning, as well as the impact of development on their settings. Such a mischaracterisation results in an incomplete evaluation of cultural effects and overlooks their importance within community life.

Furthermore, the assessment lacks consideration of intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the identity of the area, yet they are entirely omitted from the assessment, representing a significant oversight. The failure to include these factors inhibits a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement, particularly considering that the Gaelic-speaking population possesses a distinct cultural identity akin to that of Indigenous Peoples. The absence of a Free, Prior and Informed Consent process undermines the legitimacy of the assessment, failing to reflect established principles of participation in decisions that affect cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure, as it is 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 is significant and obstructs a lawful determination.

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

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been properly evaluated, and the application does not provide an adequate basis 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 critical issue that hampers a lawful evaluation of the proposed development. Although the developer engaged local residents through focus groups, the full report has not been released. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks highlighted in the developer's own research.

Residents are reportedly experiencing stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement and are not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly, limiting the evaluation of their significance during the decision-making process.

Furthermore, there is an indication that the proposal threatens community identity and cohesion, with "cultural loss" identified in the developer's findings. Despite the seriousness of these impacts, they have not been adequately incorporated into the application, nor have they been given the appropriate consideration they warrant. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of disclosure also undermines the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health impacts is essential, particularly when community character and functionality are at stake. The absence of the complete dataset means the application does not present a full evidential basis necessary for weighing benefits against harms.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid detrimental effects; however, the available evidence points to existing adverse impacts that have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy becomes impossible.

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

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of current negative impacts, leads to an incomplete and unreliable assessment. This ultimately obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further challenges any assertion of compliance with policy.

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

In summary, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage.

These deficiencies hinder a reliable evaluation and emphasise that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to marine species and habitats that have been identified as sensitive in the broader assessment.

Furthermore, the lack of detailed emergency response procedures raises additional concerns. By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether appropriate safeguards are in place to respond to pollution events. This creates procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated prior to consent, and when this information is absent, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts result in 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 assessment of marine life and fisheries within the application is incomplete and does not adequately evaluate the ecological or socio-economic impacts. The waters

near the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not demonstrate that these habitats and uses can be protected without significant disruption.

A major concern lies in the assumption that fishing activities can be displaced without negative effects. The application fails to provide evidence that alternative fishing grounds are available or can support the added pressure from displaced fishing. This lack of information is crucial, as such displacement could lead to overfishing in other areas and negatively impact the local fishing fleet's economy. Without a thorough and evidence-based evaluation, the effects on fisheries and livelihoods remain unclear.

The proposal poses substantial risks to marine species, particularly due to the underwater noise generated by construction activities. The use of high-energy hammer piling over a prolonged period is likely to disturb marine life over considerable distances, impacting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimises the significance of these impacts without adequate supporting evidence.

There is a notable contradiction within the application; it acknowledges the need for licences to harm European Protected Species, yet simultaneously describes the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity. This prevents any conclusion that the proposal represents sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and appeal to tourism. The introduction of

permanent red aviation lighting, visible over long distances, threatens to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time landscape.

Furthermore, the proposal does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given that dark skies are integral to the area's identity and to developing tourism sectors like astro-tourism. The lack of consideration for these impacts results in a discernible gap in the overall landscape and environmental evaluation.

There is also a critical failure to assess potential impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risk of collision. The application does not contain any lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting may influence these species or contribute to increased mortality rates.

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

Without the necessary assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and prevents a lawful decision-making process.

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

In conclusion, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The tourism sector on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which now supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the assessment of the

application inadequately addresses the potential economic and social impacts on this critical sector. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment neglects to evaluate how the industrialisation of the seascape and a loss of environmental quality could affect the Tourism Gross Value Added and broader economic resilience. Without this analysis, it is impossible to ascertain whether the proposed development would generate a net economic benefit or hinder a sector that is already established and growing.

The role of environmental quality in supporting tourism is also overlooked, particularly concerning the significance of unspoiled landscapes and dark skies for visitor experiences, which are crucial for emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further highlights this deficiency, creating a major gap in understanding the impacts on an increasingly recognised aspect of the local economy.

In an island community with limited economic diversification, the failure to assess tourism impacts carries broader ramifications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly 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 need to show a net benefit. It conflicts with strategic objectives that identify tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Taken collectively, the absence of a detailed quantification of tourism impacts, the lack of consideration for environmental factors influencing visitor behaviour, and the oversight of the island's economic dependency lead to a significant evidential gap. This gap inhibits 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 fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under an ostensibly stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still falls

short.

There are significant gaps in the evidential basis for the application, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the proposed mitigation measures lack specification, and crucial impact pathways—including those affecting nocturnal wildlife, full onshore infrastructure, and tourism—have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

The procedural aspects of the application also exhibit clear deficiencies. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment represents a material omission, preventing the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience. These issues collectively render the application unsuitable for determination.

Moreover, the proposal directly conflicts with National Planning Framework 4, as it does not sufficiently protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to the absence of tourism impact modelling. A proper assessment of the cumulative impact of both offshore and onshore elements is lacking, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold required to confidently exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to necessitate the submission of the missing information. A formal request is made for the outright refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

I am convinced that we need to decarbonise.

Turbines have their place but Not where they destroy the character of a landscape and affect all the natural world around them, incl. Humans and their communities. I do not separate humans from the rest of species because we all have a right to live healthy happy lives, with enough food and a home.

Basic needs.

Please do not allow wind turbines to be erected in any area affecting species that inhabit this earth.

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: 2278A632

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and its accompanying documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west side of the Isle of Lewis, the development area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns have been raised about the proposal's scale, design, and proximity, particularly with respect to its compliance with statutory obligations, national policy, and sustainable development principles.

The application is deficient in providing a sufficient evidential foundation necessary for a lawful decision. It lacks critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain unspecified. The reliance on a flexible design framework obscures the understanding of potential significant effects, and the proposed mitigation measures, which have not yet been defined, prevent any assessment of their effectiveness. Consequently, the documentation fails to furnish a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are significant policy inconsistencies associated with the proposal. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests necessary for consent and impede the competent authority's capacity to ascertain the development's acceptability in policy terms.

The proposal's scale is unprecedented in this area, with large turbines being positioned very close to the shoreline, raising considerable concerns about landscape capacity, visual dominance, and environmental consequences. In conclusion, the combination of insufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy guidelines indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the application of the precautionary principle is warranted.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to offer a comprehensive, transparent, or dependable account of the potential environmental effects associated with the proposal. The adoption of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts outlined may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from grasping the true extent of the environmental effects.

The application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed in the future impedes any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of essential information to stages occurring after consent is granted is procedurally unacceptable and contradicts the intentions of the Environmental Impact Assessment regime. Such a regime necessitates that likely significant effects and mitigation strategies be clearly defined prior to decision-making.

Moreover, the report is plagued by substantial evidential deficiencies, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Consequently, there exists uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, thus introducing scientific uncertainty that cannot satisfy statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations relating to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that appropriate safeguards exist.

In summary, the reliance on an ambiguous design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These inadequacies obstruct a lawful and rigorous assessment of environmental effects, thereby leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed development application lacks a thorough assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment

regime. It does not provide a structured and reasoned comparison of realistic alternatives that consider environmental effects, instead offering a narrative account of the project's evolution. This method does not adequately demonstrate that less harmful options have been identified, assessed, and selected over more damaging solutions.

Furthermore, there is a significant absence of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has thoughtfully considered the option of positioning turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened. Considering the sensitivity of the West Lewis coastline, the crucial importance of proximity to the shore in determining impact, and the lack of analysis in this area hinder the ability to conclude that the proposed site represents the least damaging option.

This inadequacy also extends to the evaluation of cable routing and landfall, where there is insufficient evidence showing that alternative routes have been thoroughly explored to minimise impacts on sensitive receptors, including areas of cultural and spiritual importance such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis reveal a failure to apply mitigation by design, resulting in a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been effectively minimised through site selection, layout, and infrastructure routing. This oversight signifies a failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a rigorous assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a critical omission that contributes to the overall conclusion that the application has not undergone adequate scrutiny and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is insufficient and fails to deliver a thorough and dependable understanding of ecological receptors. This marine system is both biologically active and sensitive, yet the baseline data remains incomplete, while the methodologies employed do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a sound evidential basis for the evaluation of impacts.

Significant shortcomings pertain to otters, which are a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been sufficiently examined. This gap undermines any conclusions regarding the lack of significant effects on this species.

Deficiencies are also evident in the assessment of basking sharks, where reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions. This method is likely to result in an underestimation of their presence, especially when compared to established land-based observations that show frequent utilisation of these waters. The failure to include or properly account for such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, as well as seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true extent 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 thoroughly identified or evaluated. The uncertainty created prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, granting consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented within the application is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate to the necessary evidential standard that these species will remain unaffected. The proposed development is situated within critical foraging areas and migratory routes, yet the assessment fails to effectively evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental contradiction in the application, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats

Regulations derogation case, which is only relevant in instances where significant harm is anticipated. This inconsistency raises questions regarding the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence to conclude 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 adequately acknowledged, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate potential mortality, especially where baseline data is lacking and the behavioural responses of these species are not fully understood.

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

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which precludes a lawful conclusion in support of consent. The identified deficiencies also demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally significant 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 shortcomings, and lack of adequate evidence. These failures hinder a thorough evaluation of impacts and support the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking, failing to recognise the West Lewis coastline as an active cultural landscape where environment, language, tradition, and community are interconnected. The application employs a simplistic approach, viewing heritage as separate, unchanging assets instead of acknowledging their continuous social, cultural, and spiritual roles within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice; however, the assessment characterises them merely as static features, overlooking their ongoing use, significance, and the implications of

development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural impacts and neglects their importance in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has a materially deficient assessment of social impacts, health, and wellbeing, lacking the transparency required for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, yet the full report remains unpublished. This creates a significant evidential gap that impedes both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are based on direct engagement and are not speculative. However, the failure to

disclose the complete assessment restricts proper scrutiny of these findings, thereby limiting the capacity to assess their significance in the decision-making process.

There is also notable evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been adequately integrated into the main application nor given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning may be compromised. The application fails to provide a complete evidential basis for evaluating the balance between benefits and harms due to the absence of the full dataset.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes and avoid harm, yet the evidence at hand points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be verified.

The procedural implications are significant, as the competent authority is unable to conduct a rigorous socio-economic and health evaluation without the complete Social Impact Assessment. This constitutes a material omission within the application and a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information for support.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual aspects is fundamentally lacking and does not truly capture the extent of the changes or the delicate nature of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong feeling of remoteness. The proposal to install large-scale turbines near the shoreline would introduce a continuous and imposing industrial presence, drastically altering this character and leading to a permanent and irreversible change in the landscape.

Moreover, the application fails to adequately portray the extent of the visual alterations expected. Due to their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct

effect on visual amenity, diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of these impacts within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and landscapes of high value. This poses a risk that the severity of the visual impact has been minimised, calling into question the reliability of the assessment.

Another notable shortcoming is the failure to evaluate the interconnected relationship among landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and severing their ties to the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that has not been sufficiently examined within the application.

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

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

In conclusion, the assessment fails to accurately depict the extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises immediate concerns due to the incomplete assessment of construction and pollution risks, which fails to provide the necessary detail for evaluating environmental effects. In a high-energy Atlantic environment, substantial seabed preparation and installation works are proposed, yet there are no

comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, which limits the ability to assess their adequacy or effectiveness meaningfully.

Particularly alarming is the application's dependence on undefined future measures, especially given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and vital 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 lacks sufficient detail on the prevention, control, or monitoring of these issues.

Moreover, uncertainty surrounds the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the potential extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

The absence of detailed emergency response procedures adds to these concerns. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation must be assessed before consent, and without such information, a lawful determination cannot be made. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Collectively, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts render the assessment materially deficient. These flaws inhibit a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant deficiencies in its 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 both a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate that these essential uses and habitats can be preserved or sustained without substantial disruption.

A critical concern is the assumption that fishing activity can be displaced without

repercussions. The application lacks evidence that alternative fishing grounds are both available and capable of accommodating the additional pressure that would result from displacement. This oversight is important, as such displacement could lead to overfishing in other areas, potentially affecting the local fleet's economic viability. Without a solid, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise that would be generated during construction activities. The use of high-energy hammer piling for prolonged periods is expected to create disturbances over considerable distances, impacting species such as dolphins. The anticipated effects on a significant portion of the local bottlenose dolphin population are concerning, yet the application minimizes the importance of these impacts without adequate supporting evidence.

There exists a notable inconsistency within the application, where the need for licences to allow harm to European Protected Species is acknowledged, while the impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly in cases where anticipated harm requires legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that arise from various 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 does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which prevents a conclusion that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence concerning fishing displacement, an underestimation of acoustic impacts, and internal contradictions renders the assessment incomplete and untrustworthy. These shortcomings inhibit a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises critical concerns about carbon balance. Disturbance of peatland has the potential to release stored carbon, leading to a carbon debt that runs counter to the aims of renewable energy development. The application fails to sufficiently address this matter or demonstrate that the overall carbon balance remains beneficial.

Moreover, significant risks are present for sensitive habitats, including machair systems and peatland environments, which are protected by policy. There is no evidence in the application that impacts on these habitats have been thoroughly assessed or that

suitable avoidance measures have been taken. This indicates a troubling evidential gap regarding biodiversity protection.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that necessary consents or processes have been initiated, raising doubts about the feasibility and lawful implementation of the project.

The assessment of onshore infrastructure is notably incomplete and neglects the full extent of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects. This division prevents a proper evaluation of cumulative impacts, as the Environmental Impact Assessment process requires a holistic consideration of all project components. The separation of offshore and onshore elements means that the combined effects on peatlands, habitats, and communities remain inadequately understood.

Additionally, the onshore elements include cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, poses significant risks due to its importance as a carbon store and ecologically sensitive habitat. The application does not offer a comprehensive assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

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

Collectively, the separation of project components, the absence of thorough assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, obstructing a 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 shortcomings in the assessment of tourism impacts represent a critical oversight, particularly given the importance of this sector to the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. While the application recognises that a significant 86% of visitors are attracted by scenery, it lacks a detailed evaluation of how large-scale offshore infrastructure could influence visitor numbers, their behaviour, or the overall economic contributions they make.

The economic significance of tourism has grown notably, rising from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and accounts for nearly

16% of the island's economy. Nevertheless, the application fails to explore how the industrialisation of the seascape and the consequent decline in environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without such an analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise this vital and expanding sector.

Moreover, the assessment neglects to address the essential role that environmental quality plays in supporting tourism, particularly the value 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 crucial for understanding the implications for an emerging market that includes nature-based tourism and astro-tourism.

In an island community characterised by limited economic diversification, the disregard for tourism impacts has far-reaching consequences for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been duly evaluated, as is required under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4, especially regarding the need to evaluate economic impacts and show net benefit. It also runs counter to strategic objectives that highlight tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Collectively, the failure to quantify tourism impacts, evaluate the environmental factors that drive visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This hinders a thorough assessment of the economic effects and underscores the incomplete nature of the application.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development according to statutory duties, national policy, and evidential standards. This application revisits the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was clearly established. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still lacks a reliable evidential foundation for determination.

Critical gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Furthermore, there is a reliance on unspecified mitigation measures, and key impact pathways—such as nocturnal wildlife, the full onshore infrastructure, and tourism effects—have been omitted. This makes the Environmental Impact Assessment incomplete, thereby hindering a comprehensive understanding of potential significant effects or residual impacts.

There are procedural shortcomings that cannot be overlooked. The failure to produce a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment represents a significant omission. These inadequacies obstruct the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

In terms of policy alignment, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural spaces, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and there is a lack of evidence for a net economic benefit due to missing tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty looms regarding environmental risks, with assessments of marine ecology, seabirds, protected species, and marine mammals appearing incomplete and sometimes inconsistent. The evidential threshold necessary to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and obstructs a lawful conclusion regarding acceptable impacts.

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

Overall, the application is procedurally and substantively unfit for determination. The multitude of information deficiencies, policy conflicts, and unresolved environmental risks precludes an evidence-based and lawful decision. The competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to necessitate the submission of the required missing information.

In light of these concerns, I formally request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

If you wouldn't do this to your garden why do it to others. Don't ruin an area of natural beauty for the sake of greed. This is not progress and this is not necessary. This is power and greed out of control.

I grew up on the coast you wish to damage. I dare the people making these decisions to live in this community for a few days. Visit the beaches. Walk the coast. Just experience a place like no other then tell us how important it is to ruin.

Please find another way 🙏

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: A615194E

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and supporting documentation has identified several significant deficiencies in material planning, environmental considerations, cultural aspects, 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.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a significant absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, key aspects of the proposal remain ill-defined. The use of a flexible design framework obscures a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the available documentation fails to offer a comprehensive or informed assessment of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are evident and substantive conflicts with 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 does not demonstrate compliance with national requirements intended to protect biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests required for consent, thus undermining the ability of the competent authority to deem the development acceptable within policy parameters.

The scale of this proposal is unprecedented for the location, with large turbines positioned close to the shoreline. This raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. 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 factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies present in the Environmental Impact Assessment Report render it materially inadequate, as it fails to offer a full, transparent, or reliable overview of the

proposal's likely environmental effects. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty obstructs the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts described may not correspond to the development that is ultimately realised, which in turn hinders both public understanding and the competent authority's ability to ascertain the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed subsequently precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a deferral of crucial information to post-consent phases is procedurally unacceptable and conflicts with the core objectives of the Environmental Impact Assessment regime. This regime mandates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

There are also considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects are presented without robust supporting data. The insufficient information prevents an accurate understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that are irreconcilable with statutory obligations.

As a result, the application does not satisfy the evidential standards required under the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, specifically in relation to biodiversity protection and environmental integrity. It cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of clear mitigation measures, and the existing gaps in baseline data culminate in an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured and reasoned comparison of realistic alternatives based on environmental effects. This assessment of alternatives is materially inadequate and does not meet the statutory requirements of the Environmental Impact Assessment regime. The failure to

demonstrate that less harmful options have been properly identified, assessed, and selected in preference to more damaging solutions is a significant shortcoming.

There is a notable absence of transparent or evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has meaningfully considered the possibility of positioning turbines further offshore, where potential visual, ecological, and coastal impacts might be lessened. The sensitivity of the West Lewis coastline, along with the critical role of proximity to shore in determining impact, highlights that the lack of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

Furthermore, deficiencies are evident in cable routing and landfall assessment, with insufficient evidence provided to show that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including culturally significant sites such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, suggests that mitigation by design has not been implemented, instead relying on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more appropriate alternatives are available. The lack of a robust assessment of alternatives means it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly with respect to the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission that contributes to the overall determination that the application has not undergone adequate scrutiny and thus cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant shortcomings that compromise our understanding of the ecological receptors in the West Lewis coastal environment. This area is not only sensitive but also biologically active, yet the baseline data provided is insufficient. The methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species, leading to a lack of sound evidential basis for evaluating potential impacts.

One critical oversight concerns otters, which are classified as a European Protected Species. The application fails to acknowledge their active foraging and movement along the coast, and neglects to assess their core foraging range and behavioural patterns. This oversight means the potential impacts of construction-related disturbances, including noise and increased activity, have not been thoroughly evaluated,

undermining any assertions regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks demonstrates further deficiencies. The reliance on aerial surveys introduces substantial detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when juxtaposed with reliable land-based observations that indicate frequent utilisation of these waters. The neglect to include or appropriately assess such data contributes to an incomplete baseline and diminishes the reliability of the findings.

These methodological flaws result in conclusions regarding negligible or non-significant effects that are founded on assumptions instead of robust evidence. Moreover, the lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, which raises concerns about the true risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to identify or adequately assess the protected species involved. The uncertainty created by these deficiencies obstructs the possibility of excluding adverse effects beyond a reasonable scientific doubt, thereby necessitating the precautionary principle. In light of these issues, granting consent is not a lawful option.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions culminates in an unreliable assessment. These critical failings hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, characterised by significant evidence gaps and internal contradictions that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already facing decline, yet the proposal does not adequately demonstrate, to the necessary evidential standard, that these species will not be adversely affected. Key foraging areas and migratory pathways are directly impacted by the development, but the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A critical inconsistency is evident in the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only relevant where significant harm is anticipated. This contradiction raises serious questions about the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence.

The assessment lacks sufficient evidence to ensure that seabirds linked to protected

sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not properly considered, and the reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially where baseline data is insufficient and behavioural responses are inadequately understood.

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

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, inhibiting any lawful conclusion in favour of consent.

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

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological flaws, and lack of adequate evidence. These issues impede a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces heritage to isolated, static elements, overlooking their ongoing significance within the community.

A notable shortcoming is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites of burial and spiritual practice. The assessment incorrectly categorises these as static features, neglecting their continuous use and the implications of development on their surrounding environment. This misunderstanding leads to an incomplete appraisal of cultural effects, disregarding their integral part in community life.

The absence of consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's enduring connection to the coastal

environment, further compounds these issues. These aspects are vital to the area's identity yet are entirely overlooked in the assessment, representing a considerable gap. Without addressing these essential elements, the true cultural impact of the development remains misunderstood.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been involved in a Free, Prior and Informed Consent process. This lack of genuine engagement calls into question the validity of the assessment and neglects established principles that govern participation in matters affecting cultural and environmental interests.

Moreover, a critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

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

Ultimately, the disregard for living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently assessed, and the application lacks the necessary foundation for an accurate evaluation of the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that undermines the assessment of social impacts, health, and wellbeing associated with the proposed development. Although the developer has engaged local residents through focus groups, the absence of the complete report represents a significant evidential gap. This gap restricts both public understanding and the competent authority's ability to fully grasp the social risks highlighted in the developer's own research.

Evidence shows that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are thus factual, not speculative. The lack of transparency in sharing the full assessment hinders proper scrutiny of these findings and limits the assessment of their significance in the decision-making process.

Moreover, there is a perception among residents that the proposal threatens

community identity and cohesion, with indications of “cultural loss” noted in the developer’s findings. Yet, these social impacts have not been adequately integrated into the application or given the necessary weight. Consequently, the withholding of the full assessment obscures the true human and social cost of the development.

This failure of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, particularly when they may affect community character and functioning. Without the full dataset, the application lacks a comprehensive evidential basis for weighing the balance between potential benefits and harms.

From a policy standpoint, the application does not satisfy the requirements of National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid harm; however, the available evidence reveals existing adverse effects that have not been fully disclosed. Consequently, it is impossible to demonstrate compliance with this policy in the absence of the full assessment.

The procedural implications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material flaw within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is inadequate and does not sufficiently capture the extent of change or the sensitivity of the environment involved. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally transforming this character and leading to a permanent alteration of the landscape.

The magnitude of the anticipated visual change is not accurately represented in the application. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the defining qualities of naturalness and remoteness. The assessment does not convey the significance of this impact appropriately within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence suggests that the chosen viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly in relation to culturally significant sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, which undermines the credibility of the assessment.

Moreover, the assessment overlooks the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Instead of recognising their interdependence, the assessment treats these assets as isolated, resulting in an incomplete evaluation of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The proposed changes are inconsistent with the requirements to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case scenario analysis further undermines claims of compliance with relevant policies.

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

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is inadequate and lacks the necessary detail to assess the likely environmental impacts. The project entails significant seabed preparation and installation activities in a high-energy Atlantic setting, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on future mitigation and contingency measures that are to be developed post-consent, making it impossible to assess their sufficiency or effectiveness meaningfully.

This dependence on unspecified future actions is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disruption and contamination. While the application recognises risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on the prevention, control, or monitoring of these issues.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. In the absence of robust modelling and clearly defined management strategies, it is 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.

The lack of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning to a later stage, the application hinders the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and undermines the capability of the competent authority to evaluate environmental protection measures at the time of determination.

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

In summary, the lack of specified mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts render the assessment fundamentally deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a vibrant marine ecosystem and an active fishing industry. However, the application fails to adequately evaluate the ecological or socio-economic impacts of the proposed development, raising immediate concerns about the potential disruption to these vital resources. It is alarming that the assessment makes the assumption that fishing activities can be displaced without any consequences, yet it provides no evidence to support the availability or accessibility of alternative fishing grounds that could sustain the additional pressure. This significant omission risks overfishing in other areas and poses wider economic threats to the local fishing fleet. Without a thorough, evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling expected to take place over a prolonged period is likely to disturb marine life across substantial distances, with species such as dolphins at risk. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises profound concerns. Alarming, the application downplays these potential impacts without providing sufficient supporting evidence.

Additionally, there exists a troubling inconsistency within the application. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously categorises such impacts as negligible. This contradiction not only undermines the credibility of the assessment but also raises serious concerns about compliance with the Habitats Regulations, especially where harm necessitating legal authorisation is anticipated.

The assessment also neglects to take into account the cumulative impacts that result from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and does not account for the full range of impacts that arise from this single integrated project. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a disjointed approach that obscures the true scale of environmental and socio-economic consequences.

Included in the onshore elements are cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, a vital carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall

environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; nevertheless, the division between offshore and onshore elements results in an incomplete 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 by policy. The application does not convincingly show that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This presents a distinct evidential gap concerning biodiversity protection.

Furthermore, the routing of infrastructure across active croft land raises concerns about potential conflicts with existing land use and legal rights. The application does not supply evidence that the necessary consents or procedures have been initiated, which casts doubt on the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in enhancing environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting, which would be visible over long distances, is set to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to assess the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly crucial given the value of dark skies to the identity of the area and its emerging tourism sectors, such as astro-tourism. The lack of consideration for these impacts indicates a significant deficiency in the overall landscape and environmental assessment.

Equally concerning is the absence of an evaluation regarding the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collisions. The proposal does not include any form of lighting impact assessment or phototaxis study, thus neglecting to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This deficiency is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and its associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The lack of site-specific night-time data creates a critical void in understanding ecological impacts.

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

From a policy standpoint, the omission contravenes the National Planning Framework 4 regarding the safeguarding of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider analysis of landscape and seascape impacts, as the character of night-time is an integral component of the environment.

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

TOURISM

The analysis of tourism impacts is inadequate and does not assess the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of seclusion. While the application states that 86% of visitors are attracted by scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and decline in environmental quality could impact Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would yield a net economic benefit or adversely

affect an established and expanding sector.

Furthermore, the assessment neglects the significance of environmental quality in bolstering tourism, including the value of unspoiled landscapes and dark skies for visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment worsens this shortcoming, creating a considerable gap in understanding the effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been analysed as mandated 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 also contradicts strategic objectives that highlight tourism as a key growth sector, and it does not furnish adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating environmental factors influencing visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This hampers a thorough assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a significant failure to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application reiterates the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

There are substantial gaps in the evidential basis needed for a thorough determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the exclusion of essential impact pathways—including nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences—raise serious concerns. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a complete understanding of the likely significant effects or residual impacts.

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

omission. These deficiencies hinder the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage, 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. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal would also lead to considerable and irreversible changes to a landscape of high sensitivity. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative effects on tourism represent enduring consequences that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or employ the appropriate regulatory mechanisms to demand the submission of the missing information.

In light of these concerns, I respectfully request that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I am a proud islander and have lived here all my life. I'm heartbroken about what's happening with these off and onshore developments which will ruin our island and its culture for generations.

I strongly object to this development for the following reasons

- 1 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 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

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 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

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

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))
- 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

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: BE31E9D4

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

Dear Sir/Madam

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

The application lacks a solid evidential foundation necessary for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and crucial elements of the proposal remain undefined. The reliance on a flexible design framework hinders the ability to evaluate likely significant effects, and the unspecified nature of mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Moreover, there are significant conflicts with established policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and overall environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, compromising the capacity of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned close to the shoreline, raises critical concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This area represents a sensitive and biologically vibrant marine system, yet the baseline data is lacking, and the methodologies

employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not establish a solid evidential foundation for evaluating impacts.

A significant shortcoming involves otters, a species afforded protection under European law, as the application inadequately acknowledges and assesses their active utilisation of coastal regions for foraging and movement. This oversight regarding their core foraging range and behaviour results in an insufficient evaluation of the potential effects stemming from construction disturbances, noise, and heightened activity. As a result, the conclusions regarding the absence of significant effects on this species are fundamentally undermined.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate a regular occurrence of these sharks in the waters concerned. The neglect to incorporate or adequately consider such data culminates in an incomplete baseline, further eroding the reliability of the conclusions drawn.

These methodological shortcomings indicate that the assertions of negligible or non-significant effects rely more on assumptions than on sound evidence. The lack of adequate baseline data also hinders a meaningful analysis of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This results in considerable uncertainty about the actual extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime as well as the National Planning Framework 4, due to the improper identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is not legally permissible to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development raises significant concerns regarding the reliability of its ornithological assessment, which is marked by notable gaps in evidence and inconsistencies. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not adequately demonstrate that these species will not be adversely

affected by the proposed development. The turbines are positioned within critical foraging areas and migratory routes, yet the assessment fails to sufficiently evaluate the risks associated with displacement, collision, and habitat loss.

A critical inconsistency exists in the application, as the developer asserts that there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack the necessary evidential support. Furthermore, the assessment does not convincingly 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 fully recognised, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used may underestimate potential mortality rates, especially in light of incomplete baseline data and an insufficient understanding of species behaviour.

The placement of turbines within a recognized migratory corridor presents additional significant risks, effectively forming a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term consequences of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential standard needed to ascertain 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 and renders a lawful conclusion in favour of consent unattainable.

Moreover, the identified deficiencies signify a failure to adhere to the 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 remain unaffected puts the proposal at odds with national policy.

In summary, the assessment is compromised by internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of the potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity related to the West Lewis coastline is fundamentally lacking. It does not recognise this area as a living cultural landscape where environment, language, tradition, and community are closely interlinked. Instead, the application treats heritage as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual relevance within the community.

One significant shortcoming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and centres of spiritual practice, yet they are categorised as static features in the assessment. This mischaracterisation ignores their continued use and meaning, as well as the impact of development on their surroundings. Consequently, the evaluation of cultural effects is incomplete and fails to account for their significance in community life.

Additionally, the assessment neglects intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are vital to the area's identity but are entirely omitted, representing a major gap. Without addressing these factors, the cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity with traits characteristic of Indigenous Peoples, yet no Free, Prior and Informed Consent process has been implemented. This lack of meaningful engagement undermines the assessment's legitimacy and does not align with established principles of participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is the absence of an Island Communities Impact Assessment, which is required by law under the Islands (Scotland) Act 2018. This omission means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

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

Ultimately, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations leads to a significant gap in evidence. The cultural impacts of the development have not been adequately evaluated, resulting in the application lacking a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment is a serious concern that compromises the integrity of the application. The developer conducted focus groups with local residents as part of the assessment, yet the full report has not been made available. This lack of transparency creates a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate the social risks that have been identified.

Available summaries indicate that local residents are already experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These documented impacts arise from direct engagement and therefore should not be viewed as speculative. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal poses a threat to community identity and cohesion, with the developer's own findings indicating a risk of "cultural loss." Despite this, these identified impacts have not been adequately incorporated into the main application or given the necessary weight in the assessment. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The absence of the complete dataset means that the application fails to provide a comprehensive evidential basis for balancing benefits against potential harm.

From a policy standpoint, the application does not appear to comply with National Planning Framework 4 concerning health and wellbeing. Developments must contribute to positive health outcomes and avoid negative impacts, yet the evidence suggests that adverse effects are already present and have not been fully disclosed. Without the complete assessment, the demonstration of compliance with this policy is unsubstantiated.

The procedural implications of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission represents a material flaw within the application and fails to meet the evidential requirements outlined in the Environmental Impact Assessment framework.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This deficiency prevents a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the visual, seascape, and landscape impacts is inadequate and does not truly capture the extent of change or the sensitivity of the environment involved. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a significant sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a dominant industrial presence that would

fundamentally change this character, resulting in a permanent and irreversible alteration of the landscape.

The application fails to properly depict the degree of visual change that would occur. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would have a direct effect on visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its importance within such a sensitive landscape context.

Methodological issues arise concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact may have been underestimated, thereby casting doubt on the assessment's reliability.

Additionally, there is a failure to recognise 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 fails to acknowledge this interdependence, treating these heritage assets as isolated, which leads to an incomplete understanding of their setting and cultural significance.

The industrialisation of the seascape would sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This constitutes not only a visual impact but also a significant cultural and spatial detriment that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural spaces and historical assets. The magnitude of change is incompatible 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 diminishes any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks adequate detail regarding construction and pollution risks, rendering the assessment materially deficient. It proposes substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures post-consent, which obstructs a meaningful evaluation of their adequacy or effectiveness.

This reliance on undefined future measures is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline supports 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 how these risks will be prevented, controlled, or monitored.

Uncertainties also exist regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly defined management strategies means that 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 identified as sensitive within the wider assessment.

Moreover, the absence of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to respond to pollution events. This situation 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, deferring critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainties regarding potential impacts hinder a robust evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings regarding the assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological or socio-

economic impacts. Off the West Lewis coast, the waters are home to a rich marine ecosystem and a thriving fishing industry. However, the application does not convincingly demonstrate that these vital resources can be preserved or maintained without considerable disruption.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical oversight. The West Lewis

coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting, visible across long distances, would create a continuous and intrusive effect on the western horizon, fundamentally altering the night-time landscape.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the region's identity and the burgeoning sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these impacts highlights a substantial gap in the overall landscape and environmental assessment.

Equally alarming is the failure to assess impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which may lead to disorientation and an increased risk of collision. The application does not include any evaluation of lighting impacts or a study on phototaxis, resulting in a lack of understanding regarding how aviation lighting could affect these species or contribute to increased mortality rates.

This oversight is exacerbated by the use of daytime survey data in the ornithological assessment, which neglects to capture nocturnal activities and associated risks. Other species, like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been adequately assessed. The absence of site-specific night-time data creates a significant void in understanding ecological impacts.

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

From a policy perspective, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. Moreover, they undermine the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an essential component of the overall ecosystem.

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

SUMMARY

The proposal 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. It mirrors the key concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. This new application, however, is presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided for the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Additionally, the reliance on unspecified mitigation measures and the exclusion of critical impact pathways—such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism—highlight the incompleteness of the Environmental Impact Assessment. Consequently, this assessment does not allow for a comprehensive understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to present the full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues collectively render the application unfit for determination.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further fails to establish a net economic benefit. The cumulative effects of both offshore and onshore components have not been properly assessed, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land inadequately understood.

The environmental risks associated with this proposal remain uncertain and could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent in places. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

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

Overall, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or utilise the appropriate

regulatory measures to compel the submission of the missing information.

In light of these considerations, 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: E0D893D2

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, which reveals numerous deficiencies in planning, environmental, cultural, and procedural aspects. This proposed development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The design, scale, and proximity of the wind farm to the shoreline raise significant concerns regarding compliance with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful determination. There are significant gaps in critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key elements of the proposal remain undefined. The reliance on a flexible design framework obfuscates a clear understanding of the likely significant effects, while the unspecified mitigation measures prevent any assessment of their potential effectiveness. Consequently, the documentation fails to furnish a complete or informed understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by robust evidence.

Substantial conflicts with policy are evident. The proposal is not aligned 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. Such conflicts are critical as they directly impact the statutory tests necessary for consent, undermining the competent authority's capacity to ascertain that the development adheres to policy standards.

The unprecedented scale of this proposal, with large turbines positioned in close proximity to the shoreline, brings forth serious concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, the dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ASSESSMENT OF ALTERNATIVES

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

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate 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 sensitive, and the proximity to shore significantly affects impact determination. The absence of this analysis hinders any conclusion about whether the proposed siting is the least damaging option.

The deficiencies also include cable routing and landfall assessment, with insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that mitigation by design has not been implemented, relying instead on post-design measures.

Due to these shortcomings, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from assessing whether less harmful and more suitable alternatives exist. Without a robust assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive perspective, viewing heritage merely as a collection of isolated, static assets rather than recognising their ongoing social, cultural, and spiritual relevance 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. Despite their continued use and significance, the

assessment categorises them as static features, neglecting their ongoing meaning and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and dismisses their integral role in community life.

The assessment also fails to account for intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the evaluation, representing a significant oversight. Ignoring these factors means that the true cultural impact of the development cannot be accurately assessed.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity recognised as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the legitimacy of the assessment and ignores established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018, highlights a critical procedural failure. 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 oversight alone hinders a lawful determination.

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

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application lacks a sufficient basis for determining the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts related to the proposed development is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is marked by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to capture the extent of the visual change that would occur. The size and location of the turbines would dominate views from residential areas, historic sites, and well-frequented coastal locations, adversely affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of these impacts within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and depiction of visual viewpoints. Evidence indicates that the viewpoints chosen may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and areas of high landscape value. Consequently, this raises the possibility that the visual impact has been underestimated, compromising the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context, linked visually and spatially to the Atlantic horizon. Treating these as isolated features neglects their interdependence and leads to an incomplete evaluation of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing how heritage assets are perceived and their relation to the natural horizon. This change signifies not only a visual impact but also a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The degree of change is at odds with the requirement to maintain landscape character, visual amenity, and the setting of culturally important sites. The lack of a comprehensive worst-case assessment further weakens any assertions of policy compliance.

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

Overall, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected nature of the landscape and heritage. These inadequacies prevent a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This lighting

is visible over long distances and fundamentally alters the night-time environment. A significant concern arises from the absence of an assessment regarding the impacts of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Dark skies are a key component of environmental quality, cultural identity, and tourism value in the West Lewis coastline, which is characterised by exceptionally dark skies. The lack of consideration for the importance of dark skies, particularly in relation to emerging sectors such as astro-tourism, creates a substantial gap in the Environmental Impact Assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife, despite the presence of sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are susceptible to disorientation and increased collision risk due to artificial lighting. The application fails to include a lighting impact assessment or phototaxis study, thereby neglecting to evaluate how the aviation lighting might affect these species and potentially increase mortality rates. The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not capture nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed.

The lack 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 is impossible to determine whether protected species or designated sites would be adversely affected. Consequently, the evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be met, which engages the precautionary principle and prevents a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. It also undermines the broader assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment. Overall, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The application lacks baseline data, impact modelling, and species-specific analysis, rendering it incomplete and incapable of supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with the principles of sustainable development as dictated by statutory duties, national policy, and evidential standards. It mirrors the critical issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. This new application is submitted under a more robust policy framework, which prioritises biodiversity, peatland preservation, landscape integrity, and community wellbeing, yet it fails to meet these vital requirements.

The evidential basis for the application is markedly incomplete and unreliable. Notably,

there are substantial gaps in baseline data, the proposal relies on an undefined design envelope, and the mitigation measures suggested remain unspecified. Furthermore, important impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have not been addressed. As a result, the Environmental Impact Assessment does not provide a comprehensive understanding of the potential significant effects or residual impacts.

In addition to the shortcomings in evidence, there are also notable procedural flaws. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such deficiencies hinder the competent authority's ability to properly evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application inadequate for determination.

The proposal is fundamentally at odds with the National Planning Framework 4. It does not establish adequate protection for biodiversity, natural environments, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit, particularly due to the absence of modelling regarding tourism impacts. Additionally, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential consequences for peatlands, carbon balance, habitats, and crofting land.

There are unresolved environmental risks that remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent with each other. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The vast scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is incumbent upon the competent authority to refuse consent based on these grounds or to invoke the relevant regulatory provisions to demand the submission of the necessary missing information.

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

Additional Comments

Having lived in many different countries, returning to the island has allowed me to appreciate the value of our distinctive environment here. I understand the issues we have that present challenges, but feel that the creation of this renewable project here and now will not sufficiently offset the negatives-short term handouts will be seen to be mitigating social problems; those corporate steps suggested are inadequate -it is not a case of Nimbyism-it is a case of weighing up what will be lost and the cost is too high to countenance.

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: C8830281

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and strong cultural identity. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key elements of the proposal remain undefined. The employment of a flexible design framework hinders a clear assessment of likely significant effects, and the proposed mitigation measures, which have not yet been specified, preclude an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

There are significant policy conflicts inherent in the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises further concerns, with large turbines positioned in close proximity to the shoreline, leading to significant issues regarding landscape capacity, visual dominance, and environmental impact. In light of the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design

Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the consistent application of a worst-case scenario. This compromises the assessment's integrity, meaning that the impacts outlined may not accurately represent the development that will eventually be constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought with the assumption that environmental harm will be managed at a later date. This prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. The deferral of crucial information to stages post-consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be thoroughly established before determination.

There exist significant evidential shortcomings, such as gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These deficiencies lead to uncertainty regarding the scale and significance of the impacts, particularly where claims 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, generating scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential standards set forth in the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, thereby preventing the competent authority from making an informed decision based on the information presented.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application raises significant concerns regarding its reliability and thoroughness, primarily due to internal inconsistencies and substantial evidence gaps. It is critical to note that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. The application fails to sufficiently demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. Key foraging areas and

migratory pathways, which are crucial for these birds, are affected by the proposed development. However, the assessment does not adequately address the implications of potential displacement, collision risks, or habitat loss.

A notable contradiction is evident within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically needed when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and indicates that its conclusions are not underpinned by solid evidence. The assessment lacks adequate evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is insufficiently acknowledged, and the use of modelling approaches introduces further uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in the context of incomplete baseline data and incomplete understanding of species' behavioural responses.

The positioning of turbines within an acknowledged migratory corridor poses additional significant risks, as it effectively creates a barrier along a primary flight route for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which precludes a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage and community identity assessment is fundamentally insufficient, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. The application reduces heritage to isolated, static assets, disregarding their ongoing social, cultural,

and spiritual significance within the community.

Culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas, are misrepresented in the assessment. These locations serve as active sites of burial and spiritual practice, yet they are classified as static features. This mischaracterisation neglects their current use and meaning, as well as the impact of development on their setting, leading to an incomplete evaluation of cultural effects and dismissing their importance within community life.

Moreover, the assessment fails to consider intangible cultural heritage, such as the Gaelic language, traditions, and the established relationship between the community and the coastal environment. These aspects are integral to the area's identity but have been entirely omitted from the assessment, creating a significant gap. Without addressing these factors, the true cultural impact of the development remains poorly understood.

Concerns extend to community rights and engagement. The Gaelic-speaking population holds a unique cultural identity with characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement questions the legitimacy of the assessment and neglects established principles regarding participation in decisions that affect cultural and environmental interests.

A serious procedural flaw is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately fulfil its legal obligation to evaluate the social, cultural, and economic ramifications for the island community. This omission alone renders any lawful determination impossible.

From a policy standpoint, these shortcomings clash directly with the National Planning Framework 4, particularly regarding 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, indicates a clear deviation from policy requirements.

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural consequences of the development have not been adequately examined, and the application does not establish a sufficient foundation for evaluating the genuine cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, conveys a strong sense of remoteness. The introduction of large-scale turbines in such close proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual

impacts fails to adequately reflect the scale of this change and the sensitivity of the receiving environment.

The magnitude of visual change resulting from the proposed turbines is inadequately represented in the application. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, which would directly affect visual amenity and degrade the defining qualities of naturalness and remoteness. The assessment does not convey the level of impact or its significance in relation to such a sensitive landscape.

Moreover, there are concerns regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This oversight raises the risk that the visual impact has been understated, thus compromising the reliability of the assessment.

Another critical deficiency is the failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these important connections, altering the experience of heritage assets and disrupting their relationship to the natural horizon. This not only represents a visual impact but also inflicts broader cultural and spatial harm that has not been properly considered in the application.

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

It is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. The changes they would bring about are fundamental and permanent, rather than reducible to acceptable levels through mitigation efforts.

In summary, the assessment fails to accurately capture the scale of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the view that the proposal is incompatible with protecting this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is distinguished by exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to address the assessment of

dark skies and nocturnal wildlife, representing a material omission. The proposed introduction of permanent red aviation lighting, which would be visible over long distances, risks creating a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly concerning given the importance of dark skies to the area's identity and emerging tourism sectors, such as astro-tourism. The failure to consider these aspects leads to a noticeable gap in the overall landscape and environmental assessment.

More critically, the absence of any evaluation regarding the effects on nocturnal wildlife cannot be overlooked. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application lacks a lighting impact assessment or a phototaxis study, preventing an understanding of how aviation lighting may affect these species or contribute to mortality rates.

This gap is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately reflect nocturnal activity or the associated risks. Species such as Kittiwakes, which might forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this potential impact has not been addressed. The absence of site-specific night-time data creates a significant deficiency in understanding the ecological impacts.

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

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

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

TOURISM

The evaluation of the tourism impacts associated with this application is significantly lacking, particularly regarding the economic and social repercussions for a vital part of the Isle of Lewis economy. The local tourism industry relies heavily on the region's wild

coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how the introduction of large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

Tourism on the Isle of Lewis has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, creating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the potential consequences of seascape industrialisation and environmental degradation on Tourism Gross Value Added and the resilience of the wider economy. Without this critical analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and expanding sector.

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its attempt to meet the requirements for sustainable development, as it does not align with statutory obligations, national policy, or evidential standards. This application revisits the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to provide a

reliable and comprehensive evidential basis for evaluation.

Key deficiencies in the application include significant gaps in baseline data, the use of an undefined design envelope, unspecified reliance on mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

Additionally, the application suffers from procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment represents a material omission. Such deficiencies prevent the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal is incompatible with National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not provide assurance that health and wellbeing impacts are acceptable 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 adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and significant environmental risks persist, particularly concerning marine ecology, seabirds, protected species, and marine mammals. The assessments provided are incomplete and occasionally inconsistent, failing to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, which prohibits a lawful conclusion that the impacts are acceptable.

Furthermore, the proposal would lead to 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 relationships, and the negative effects on tourism all represent permanent impacts that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

The west side of the island of Lewis has a number of very popular visitor/tourist attractions including the Callanish standing stones, the Carloway broch, the Shawbost Norse mill and kiln and the Arnol Blackhouse. The scale of the proposed offshore windfarm and the close proximity to the coastline will severely impact on the visual aspect of these historic visitor attractions.

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: 87899381

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 applicable marine licensing and Environmental Impact Assessment regimes. Upon reviewing the Environmental Impact Assessment Report and its accompanying documentation, several deficiencies have been identified that relate to planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. There are significant concerns regarding the compatibility of the proposal's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficiently evidential basis to facilitate a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key aspects of the proposal remain undefined, which hinders a thorough understanding of the likely significant effects. The reliance on a flexible design framework and unspecified mitigation measures prevents the assessment of their effectiveness, leading to an incomplete picture of the potential environmental, cultural, or community impacts. Consequently, claims of negligible or non-significant effects lack robust evidential support.

There are also significant policy conflicts evident within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly in terms of biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to convincingly demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they undermine the ability of the competent authority to ascertain that the development aligns with policy objectives.

The scale of the proposed wind farm is unprecedented for this area, with large turbines positioned in proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and overall environmental impact. In summary, the lack of sufficient information, reliance on undefined mitigation strategies, evidential inadequacies, and clear policy non-compliance collectively indicate that the application is incomplete and fails to support a lawful determination. In light of these issues, it is essential that the precautionary principle is applied.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives in the application is fundamentally inadequate and fails to satisfy the statutory requirements mandated by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental impacts, the submission provides merely a narrative of the project's development. This methodology does not demonstrate that less harmful options have been sufficiently identified, assessed, and selected over more damaging alternatives.

A clear and evidence-driven comparison of different offshore locations, varying development scales, or design configurations is absent. Notably, the application does not prove that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact, the lack of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient documentation that alternative routes have been adequately examined to avoid or mitigate effects on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis suggest that there has been no application of mitigation by design, instead relying heavily on measures to mitigate post-design.

Consequently, the application does not establish 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, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it is impossible to determine that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a significant shortcoming that contributes to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

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 evaluation of community identity and cultural heritage is markedly insufficient and overlooks the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply interwoven. This application adopts a simplistic view, treating heritage merely as a collection of static, isolated features, rather than recognising their vital ongoing social, cultural, and spiritual relevance to the community.

A significant concern arises from the handling of culturally important sites, notably the cemeteries at Dalmore, Bragar, and Barvas. These locations are active spaces for burial and spiritual practice, yet they are relegated to static classifications. This mischaracterisation neglects their continued usage, the meaning they hold for the community, and the potential impacts of development on their surroundings.

Consequently, this leads to an incomplete assessment of cultural ramifications and dismisses their integral role within the lives of community members.

Moreover, the application fails to take into account intangible cultural heritage, such as the Gaelic language and local traditions, as well as the enduring connection between the community and the coastal environment. These aspects are essential to the area's identity, yet they are glaringly absent from the assessment, highlighting a substantial oversight. The neglect of these factors severely hampers the ability to fully grasp the cultural implications of the proposed development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population has a unique cultural identity, characterised by attributes of an Indigenous People, yet there has been no effort to secure Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and fails to align with recognised principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural lapse in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this crucial assessment, the relevant authorities cannot meet their legal obligations to consider the social, cultural, and economic effects on the island community. This failure in itself renders any determination made on the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, particularly regarding the safeguarding of historic sites and cultural places. The oversight in recognising both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear deviation from policy expectations.

In summary, the cumulative failure to assess living heritage, intangible cultural values, community rights, and statutory requirements leads to a substantial evidential void. The cultural consequences of the proposed development have not been appropriately examined, and the application lacks a solid foundation for understanding the genuine cultural costs involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented regarding seascape, landscape, and visual impacts is significantly inadequate and fails to convey the true extent of change anticipated or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shore would establish a persistent and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application does not sufficiently represent the extent of this visual transformation. The size and nearness of the turbines will dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the defining characteristics of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. This suggests a possibility that the scale of the visual impact has been downplayed, which undermines the assessment's reliability.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated 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, leading to an incomplete appraisal of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historical assets. The magnitude 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 analysis further weakens any assertion of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visibility would be overwhelming and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately reflect the extent of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings preclude a dependable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application presents serious deficiencies in its assessment of fisheries and marine life, which fails to adequately evaluate ecological or socio-economic impacts. The

waters off the West Lewis coast are home to both a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these essential uses and habitats can be preserved without causing significant disruption.

A critical flaw in the application is the assumption that displacing fishing activities will not have consequences. There is a lack of evidence regarding the availability or accessibility of alternative fishing grounds that could support the additional pressure. This gap in the assessment is significant, as it poses the risk of overfishing in other areas and may lead to broader economic ramifications for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and the livelihoods of those who depend on them remain unclear.

The proposal introduces notable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged high-energy hammer piling is expected to disturb marine life over large distances, with particular concern for species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application downplays these effects without providing adequate supporting evidence.

Moreover, the application contains an internal inconsistency, as it acknowledges the need for licenses to allow harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby failing to confirm that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking, failing to consider the full scope of impacts from what constitutes a single integrated project. The offshore turbines and onshore works are inherently interconnected, yet they have been

evaluated separately. This fragmented approach obscures the true extent of environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. Excavation will occur in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically delicate habitat. As a result, the application does not provide a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The failure to assess the onshore impacts, whether by exclusion or deferral, inhibits proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively. However, the division of offshore and onshore elements means that the combined repercussions on peatlands, habitats, and communities remain inadequately understood.

Furthermore, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not demonstrate a thorough evaluation of impacts on these habitats or the application of appropriate avoidance measures, thus revealing a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland leads to the release of stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or show that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, raising concerns over both deliverability and lawful execution.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding sustainable development and does not meet the necessary statutory duties.

It mirrors the issues that caused the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being submitted under a more stringent policy framework that emphasises biodiversity and community wellbeing, it fails to provide a comprehensive evidential basis for assessment.

Critical gaps in baseline data and reliance on an undefined design envelope undermine the application. There are also unspecified mitigation measures and significant omissions, such as impacts on nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment remains incomplete, hindering a thorough understanding of significant effects and residual impacts.

Additionally, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment is a substantial omission. These issues prevent the competent authority from effectively evaluating impacts on community wellbeing and cultural identity, making the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to safeguard biodiversity, natural places, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, complicating assessments related to peatlands, carbon balance, and crofting land.

The environmental risks associated with this proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The application does not meet the evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is essential for the competent authority to refuse consent for the Spiorad na Mara Offshore Wind Farm application or require the submission of the missing information.

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: 15460D80

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation has identified significant deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the proposed development raise serious concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal are not clearly defined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects are unsupported by robust evidence.

There are substantial conflicts with existing policies. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposed development in this area raises considerable concerns, particularly regarding landscape capacity, visual dominance, and environmental impact, due to the large turbines being positioned close to the shoreline. In light of the insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident 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 completeness and does not reliably account for the potential environmental effects of the proposal. A flexible Project Design Envelope is employed without any commitment to specific turbine dimensions or layouts, creating significant uncertainty. This uncertainty hinders a proper application of a worst-case scenario analysis. As a result, the assessment's integrity is compromised, leading to impacts that may not accurately represent the development that will ultimately be constructed. This lack of clarity prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the basis that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness and leaves residual impacts unassessed. Deferring essential information to post-consent stages is not acceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires that likely significant effects and mitigation be clearly established before a determination is made.

There are notable gaps in the evidence presented, including insufficient baseline data and methodological limitations. The application also relies on assumptions rather than site-specific evidence. This introduces uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been thoroughly assessed or that appropriate safeguards are established for biodiversity protection and environmental integrity.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data leads to an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects and leave the competent authority unable to make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application proposes a development that inadequately assesses alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it provides a narrative account of the project's evolution. This narrative does not demonstrate that less harmful options have

been identified, assessed, and selected over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, particularly concerning the ecological receptors present in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data remains inadequate, while the methodologies employed fail to accurately document the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A significant shortcoming involves the European Protected Species of otters, for which the application does not sufficiently recognise or assess their use of coastal regions for both foraging and movement. The neglect of their core foraging range and behavioural patterns has led to an inadequate evaluation of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises any conclusions drawn regarding the absence of significant effects on this species.

The assessment also encounters shortcomings regarding basking sharks, as it relies heavily on aerial surveys that introduce significant detection bias, particularly in the challenging conditions of the Atlantic. This reliance likely leads to an underestimation of the sharks' presence, especially when contrasted with established land-based observations showing frequent utilisation of these waters. The failure to integrate or properly consider such data contributes to an incomplete baseline, thereby undermining the reliability of the presented conclusions.

These methodological flaws result in findings of negligible or non-significant effects that are based on assumptions rather than substantial evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. Such gaps foster uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set out in the Environmental Impact Assessment regime and the National Planning Framework 4, as protected species have not been accurately identified or assessed. The degree of uncertainty introduced obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable and contains significant gaps in evidence and internal contradictions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected. The development is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, or habitat loss have not been thoroughly evaluated.

There is a notable contradiction in the application. The developer claims that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence.

The evidence provided fails to show that seabirds connected with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The significance of these feeding grounds is not properly considered, and the reliance on modelling methods

introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate potential mortality, especially since baseline data is lacking and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and serious risk. It effectively creates 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 consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the required evidential threshold 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 limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle, which prevents a lawful conclusion in favour of consent.

The deficiencies noted also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be negatively impacted puts the proposal in direct conflict with national policy.

In summary, the assessment is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within this application is fundamentally flawed, failing to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The approach taken is overly simplistic, treating heritage merely as isolated and static features, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not just static features; they serve as active sites for burial and spiritual practices. The assessment neglects their continuous use and meaning, as well as the potential impact of development on their setting. This mischaracterisation leads to a superficial evaluation of cultural effects and ignores their integral role in community life.

Furthermore, there is a significant omission in the assessment of intangible cultural heritage, including the Gaelic language and traditions, alongside the established relationship between the community and the coastal environment. These elements are vital to the area's identity but are completely overlooked, making it impossible to

accurately grasp the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which has characteristics recognised as those of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles for participation in decisions affecting cultural and environmental interests.

Additionally, there is a critical procedural error in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone invalidates the determination process.

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

In conclusion, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations has resulted in a substantial evidential gap. The cultural impacts of the development have not been adequately examined, and the application lacks a sufficient basis to evaluate the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The community's wellbeing is at stake due to the significant deficiencies in the assessment of social impacts, health, and wellbeing associated with this proposal. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer's research.

Residents are already facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts have been confirmed through direct engagement and are not merely speculative. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, ultimately affecting their significance in the decision-making process.

Moreover, the proposal has been perceived as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application nor given the attention they deserve. By withholding the full Social Impact Assessment, the true social and human costs of the development remain obscured.

This lack of transparency further undermines the Environmental Impact Assessment process. Understanding the comprehensive social, economic, and health impacts is crucial for developments of this magnitude, especially when they threaten community character and functioning. The omission of the full dataset renders the application insufficient for assessing the balance between benefits and potential harm.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet the evidence currently suggests existing adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with relevant policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a critical omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, paired with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy prevents a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts in the application is significantly lacking and does not fully capture the extent of the changes or the sensitivity of the environment it would affect. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The proposal to introduce large-scale turbines near the shoreline would create an overwhelming industrial presence, leading to a permanent and irreversible alteration of this landscape.

The assessment fails to adequately depict the scale of the visual change expected from the turbines, which would dominate views from residential areas, historic locations, and popular coastal spots. This would severely impact visual amenity, detracting from the area's naturalness and sense of remoteness. Such shortcomings in the evaluation overlook the significant implications of these impacts on a landscape known for its sensitivity.

Concerns also arise regarding the methodologies used to choose and present visual viewpoints. There is evidence that these viewpoints may not encompass the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This raises the possibility that the actual visual impact has been underestimated, thereby questioning the reliability of the overall assessment.

Another notable deficiency is the lack of consideration for the interconnected nature of landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape context, defined by visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to recognise their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural value.

The introduction of industrial elements to the seascape would disrupt these relationships, changing the environment in which heritage sites are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but a deeper cultural and spatial disturbance that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, especially concerning the safeguarding of natural landscapes and historic assets. The level of change proposed is incompatible with the imperative to protect landscape character, visual amenity, and the contexts of culturally significant sites. The failure to provide a comprehensive worst-case assessment further undermines any assertions of compliance with relevant policies.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes envisaged would be fundamental and permanent, rendering the possibility of acceptable mitigation illusory.

In summary, the assessment does not accurately reflect the magnitude of the impacts, the environment's sensitivity, or the intrinsic connections between landscape and heritage. These deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposed development is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal for construction within a high-energy Atlantic environment necessitates substantial seabed preparation and installation works, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead depends on the development of mitigation and contingency measures after consent has been granted, which limits any effective assessment of their potential adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns, particularly in relation to the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to disturbances from sediment and contamination. While the application

acknowledges risks associated with sediment mobilisation and the possibility of accidental chemical or oil spills, it does not adequately detail preventive, control, or monitoring measures.

Moreover, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, assessing the extent, duration, or ecological consequences of these impacts becomes impossible. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive in the broader context.

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 in place to address pollution incidents. This deferral introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and corresponding mitigation must be evaluated before consent is granted, and the absence of this information precludes a lawful determination. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the failure to define mitigation measures, the inadequacy of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not provide a robust evaluation of the ecological or socio-economic impacts associated with the proposed development. This deficiency raises serious concerns regarding the ability to protect and maintain these vital uses and habitats without significant disruption.

A critical flaw in the application is the assumption that fishing activity can be displaced without negative consequences. There is no evidence presented to show that alternative fishing grounds are available or able to support additional pressure, making this omission particularly significant. The potential for displacement risks overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the true impacts on fisheries and livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, primarily due to

the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to disturb marine life over large distances, notably affecting species such as dolphins. Despite the serious implications for a significant portion of the local bottlenose dolphin population, the application minimizes these effects without adequate supporting evidence.

There exists an inconsistency within the application, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This contradiction casts doubt on the credibility of the assessment and raises compliance concerns with the Habitats Regulations, especially where potential harm is anticipated to a degree requiring legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and 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 adequately illustrate that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus obstructing 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 inconsistencies undermine the assessment's reliability. These shortcomings prevent a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of onshore infrastructure, leaving a significant evidential gap regarding the project's overall environmental footprint. This project encompasses both offshore turbines and onshore works, which are intrinsically linked but have been assessed separately. Such a fragmented approach obscures the true scale of the environmental and socio-economic effects, particularly concerning the impacts on sensitive habitats and communities.

Key onshore elements include the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, all of which traverse sensitive landscapes. Excavation across deep peat areas, especially within Barvas Moor—an ecologically significant habitat and vital carbon store—has not been adequately evaluated. The lack of a full assessment prevents a proper understanding of cumulative effects and undermines the Environmental Impact Assessment process, which mandates that all components of a project be considered together.

The proposal raises critical concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the

aims of renewable energy initiatives. Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights, as the application does not provide evidence of necessary consents or processes, thereby calling into question the deliverability of the project.

In terms of policy compliance, the failure to assess the project as a cohesive whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with established frameworks such as the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts on sensitive habitats have been fully assessed, or that adequate avoidance measures are in place, diminishes the reliability of the application. Ultimately, the separation of project components, alongside the absence of a thorough assessment, renders this part of the application incomplete and unfit for lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application lacks a comprehensive assessment of dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which contribute greatly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting visible over long distances would create an intrusive "wall of light" effect on the western horizon, fundamentally changing the night-time environment.

There is no analysis of how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. This gap is particularly concerning given the crucial role dark skies play in the area's identity and the growth of tourism sectors such as astro-tourism. The failure to examine these impacts represents a clear deficiency in the overall assessment of the landscape and environment.

The application also neglects to evaluate the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and heighten collision risks. Without a lighting impact assessment or phototaxis study, the proposal fails to consider how aviation lighting could affect these species or increase mortality rates.

This shortcoming is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related risks. Other species, such as Kittiwakes, may also forage or migrate at night and are susceptible to disorientation caused by artificial lighting. The lack of site-specific night-time data leads to a critical deficiency in understanding ecological impacts.

In the absence of an evaluation of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would suffer adverse impacts. 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 concerning the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an essential aspect of the environment.

Overall, the failure to assess dark skies and nocturnal wildlife results in a significant evidential gap. The absence of baseline data, impact modelling, and specific analysis of affected species leaves the application incomplete and unable to support a lawful determination.

TOURISM

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

Tourism on the Isle has seen considerable growth, 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 impacts of seascape industrialisation and environmental quality degradation on Tourism Gross Value Added or the wider economic resilience of the area. Without this analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment overlooks the critical role of environmental quality in promoting tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as to emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, resulting in a considerable gap in understanding the implications for a recognised and growing segment of the local economy.

Given the context of an island community that has limited economic diversification, the lack of an assessment of tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The failure to conduct 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 the National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise

tourism as a growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

In summary, the inability to quantify tourism impacts, evaluate the environmental drivers of visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This inadequacy 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 demonstrates a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, despite being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the proposal remains flawed.

The evidential basis for the application is neither complete nor reliable. Key baseline data is missing, the design envelope is not clearly defined, and unspecified mitigation measures are relied upon. Additionally, essential impact pathways have been overlooked, including those related to nocturnal wildlife, onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, the application presents serious shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately protect biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leaving the impacts on peatlands, carbon balance, habitats, and crofting land unclear.

Uncertainty surrounds potential environmental risks, which could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

The proposal threatens to cause substantial and irreversible changes to a sensitive landscape. Industrialisation along the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual connections, and negative impacts on tourism create permanent effects that cannot be mitigated satisfactorily.

In summary, the application is both procedurally and substantively unfit for determination. The extent of information gaps, coupled with policy contradictions and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either refuse consent based on these grounds or use appropriate regulatory measures to require the submission of the missing information.

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

Additional Comments

MD-00011742 & MD-00011743 - Spiorid na Mara Limited - Spiorid na Mara Offshore Wind Farm - Isle of Lewis

I formally OBJECT to the above application as it convenes the afore mentioned planning policies and guidance.

In addition, in my view, the onshore impacts on irreplaceable machair and deep Peatland remain unassessed for Caesium 137 released from the devastating Chernobyl explosion on 26 April 1986, when the Western Isles of Scotland was one of the most affected areas by the fallout. 40 years later, the Peatland is still contaminated. Hundreds of thousands of tons of peat would be disturbed due to this development if it were to go ahead. I have no confidence in any of SEPA's recommendations or assessments, and I suggest that an independent assessment should be implemented URGENTLY, as the consequences could be SERIOUS for the population, and for the workers engaged in the massive excavation operation.

Offshore wind farms are an expensive disaster, NOT economical. The general public are going to have to pay in order to provide subsidies to International companies and shareholders.

There is no benefit to the local communities.

[Redacted]

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 28AA2487

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment regulations. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious concerns about its alignment with statutory requirements, national policies, and sustainable development principles.

The application lacks a solid evidential foundation for a lawful determination. There is critical missing environmental data, with limited and inconsistent baseline information, leaving many key elements of the proposal undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and without specific mitigation measures outlined, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are substantial conflicts with existing policy frameworks. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, compromising the authority's ability to determine that the development aligns with policy standards.

Unprecedented in scale for this location, the proposal features large turbines situated in close proximity to the shoreline, raising considerable concerns about landscape capacity, visual impact, and environmental ramifications. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations, it is evident that the application is incomplete and unfit for a lawful determination. Therefore, the precautionary principle must be invoked in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a complete, transparent, or trustworthy account of the probable environmental impacts of the proposal. The reliance on a flexible Project Design Envelope, which lacks commitment to definitive turbine dimensions, layouts, or configurations, creates substantial uncertainty and obstructs the consistent application of a worst-case scenario. This weakens the integrity of the assessment, meaning that the impacts outlined may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are unable to comprehend the true scope of environmental effects.

Furthermore, the application places significant dependence on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that environmental harm will be managed at a later stage impedes any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contravenes the aims of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to determination.

There are notable evidential shortcomings as well, including gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This results in ambiguity regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are presented without strong supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory demands.

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

Overall, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder 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 assessment concerning marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This marine system is

highly sensitive and biologically active; however, the baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is significantly flawed, exhibiting gaps in evidence and inconsistencies that diminish its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application fails to meet the necessary evidential standards to demonstrate that these species will not be adversely affected. Situated within crucial foraging areas and migratory pathways, the proposed

development does not adequately assess the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically invoked only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the supporting evidence. The assessment lacks sufficient information to conclude that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling techniques adds a layer of uncertainty, especially for species experiencing severe declines, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor introduces a significant risk by creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality within this corridor or the potential impacts on species with small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, combined with data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent. The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to its internal contradictions, methodological flaws, and insufficient evidence. These shortcomings impede a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, landscape, and seascape impacts lacks thoroughness and does not adequately account for the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped nature, and a pronounced sense of remoteness. The planned introduction of large turbines in close proximity to the coast would lead to a continuous and predominant industrial presence, fundamentally altering this character and effecting a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately depict the extent of this visual change. The size and location of the turbines would overshadow views from residential properties, historical sites, and frequently visited coastal areas. Consequently, this would adversely affect visual amenity and diminish the inherent qualities of naturalness and remoteness. The assessment does not sufficiently articulate this impact or its importance within the context of such a sensitive landscape.

Concerns also arise from the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the actual visual impact has been understated, thereby compromising the credibility of the assessment.

Additionally, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape framework that links them visually and spatially to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, leading to an incomplete appraisal of their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This situation presents not merely a visual impact but also a broader cultural and spatial detriment that has not been adequately evaluated in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural areas and historical assets. The anticipated level of change contradicts the necessity to protect landscape character, visual amenity, and the context of culturally important sites. The lack of a thorough worst-case analysis further diminishes any assertions of compliance with policy.

It is evident that the identified impacts cannot be sufficiently mitigated. Given the scale, height, and proximity of the turbines, their presence would be overpowering and unavoidable. The change is thus fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

Collectively, the assessment fails to accurately reflect the magnitude of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works within a high-energy Atlantic environment, yet the assessment of construction and pollution risks is inadequate. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, leading the application to depend on mitigation and contingency measures that are to be prepared after consent. This lack of detail obstructs a meaningful assessment of their adequacy or effectiveness.

The sensitivity of the receiving environment raises further concerns. The West Lewis coastline features clean coastal waters and crucial habitats that are vulnerable to both sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide sufficient detail on prevention, control, or monitoring measures for these risks.

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

Compounding these issues is the absence of detailed emergency response procedures. The deferral of contingency planning to a post-consent stage hinders the evaluation of whether adequate safeguards are in place for responding to pollution events. This situation introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement 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 without this information, a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The overall assessment of the proposal is fundamentally flawed due to numerous deficiencies that undermine its credibility. A significant concern is the failure to adequately evaluate the socio-economic impacts on the active fishing industry and the diverse marine ecosystem off the West Lewis coast. The application does not provide evidence that alternative fishing grounds can accommodate any displacement resulting from the proposed activities. This raises critical questions regarding the sustainability of local fisheries, as the potential for overfishing in other areas poses

wider economic risks for the local fleet.

Furthermore, the assessment underestimates the impact of underwater noise, particularly from high-energy hammer piling, which is anticipated to disrupt marine life over extensive areas. The concerns surrounding the disturbance to the local bottlenose dolphin population are serious, yet the application downplays these effects, lacking sufficient evidence to justify this stance. There is a troubling contradiction within the application itself; while it acknowledges the necessity of licenses to allow for harm to European Protected Species, it simultaneously claims that the anticipated impacts are negligible. This inconsistency calls into question compliance with the Habitats Regulations and the overall integrity of the assessment process.

Moreover, the assessment does not take into account the cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined factors, it is impossible to ascertain the full effects on marine ecosystems and the socio-economic conditions that depend on them.

From a policy perspective, 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 existing marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of evidence regarding fishing displacement, coupled with the underestimation of acoustic impacts and the internal inconsistencies present, ultimately renders the assessment incomplete and unreliable. Thus, a robust evaluation of the impacts on marine life and fisheries remains unachievable.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

combined impacts on peatlands, habitats, and local communities effectively.

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

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

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

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

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

SUMMARY

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

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

Procedural shortcomings are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the

Islands (Scotland) Act 2018. The failure to provide a complete Social Impact Assessment represents a serious omission that prevents the competent authority from evaluating the effects on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

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

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

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: BC3FB35B

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 is submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a review of the Environmental Impact Assessment Report along with the supporting documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and rich cultural identity, and concerns regarding its scale, proximity, and design raise important questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination, with critical environmental data missing and baseline information being limited and inconsistent. Additionally, many key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, and the absence of specified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Moreover, there are notable policy inconsistencies present. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to determine whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent account of the potential environmental effects associated with the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the ability to apply a worst-case scenario consistently. As a result, the integrity of the assessment is compromised, and the impacts presented may not accurately reflect the development that will ultimately be constructed. This situation prevents both the public and the competent authority from grasping the true extent of the environmental effects involved.

Furthermore, the application heavily relies on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent on the premise that environmental harm will be mitigated at a later stage hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation be clearly identified prior to determination.

Additionally, there are substantial evidential deficiencies within the report. These include gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Consequently, this leads to uncertainty about the scale and significance of impacts, particularly in cases where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate adherence to the National Planning Framework 4, which includes mandates regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The Environmental Impact Assessment regime mandates a comprehensive assessment of alternatives, yet the current application falls significantly short of these

requirements. Instead of offering a systematic and reasoned comparison of feasible alternatives grounded in their environmental consequences, the application merely recounts the project's development history. This method fails to reveal whether less harmful options have been adequately identified, evaluated, and favoured over more detrimental solutions.

Moreover, there is a notable lack of transparent, evidence-based comparisons concerning alternative offshore sites, varying scales of development, or design configurations. Specifically, the application does not convincingly illustrate that the developer has genuinely explored the possibility of situating turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining overall impact, the absence of this analysis inhibits the ability to conclude that the proposed location is indeed the least damaging option available.

This inadequacy extends to the evaluation of cable routing and landfall selection, where there is insufficient evidence indicating that alternative pathways have been thoroughly investigated to avoid or lessen impacts on sensitive receptors. This includes culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy to avoid these impacts, combined with the absence of comparative analysis, suggests that the principle of mitigation by design has not been embraced, instead deferring to post-design mitigation strategies.

Consequently, the application does not sufficiently demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to determine whether less harmful and more suitable alternatives exist. Without a detailed assessment of alternatives, one cannot conclude that the proposal is sustainable or aligns with policy requirements.

From a policy standpoint, this shortfall undermines compliance with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight, contributing to the overarching conclusion that the application has not been adequately evaluated and does not warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is significantly lacking, failing to provide a thorough or dependable understanding of the ecological receptors present within the West Lewis coastal environment. This area is recognised for its biological activity and sensitivity, yet the baseline data remains incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment falls short of offering a solid evidential foundation for impact evaluation.

In particular, there is a crucial oversight concerning otters, a species that is protected under European law. The application neglects to adequately recognise and assess their active utilisation of coastal zones for both foraging and movement. This failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts arising from construction disturbance, noise, and increased human activity. Such oversights undermine any conclusions drawn regarding the absence of significant effects on this species.

The evaluation of basking sharks also reveals serious deficiencies, particularly due to the reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show frequent usage of these waters. The disregard for such pertinent data leads to an incomplete baseline and undermines the validity of the conclusions reached.

These methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Furthermore, the lack of comprehensive baseline data hampers meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty concerning the true extent of the risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to properly identify or assess protected species. The uncertainty arising from these deficiencies prevents the definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

There is a fundamental contradiction within the application, as the developer concludes there will be no significant adverse effects while simultaneously advancing a

Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. The assessment does not convincingly prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. Moreover, it fails to fully account for the importance of these vital feeding grounds, and its reliance on modelling approaches adds further uncertainty, particularly for species in steep decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding regarding behavioural responses.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application takes a reductive approach by treating heritage merely as a collection of isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

A critical shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial and spiritual sites; however, they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of

development on their surroundings. The result is an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Additionally, the assessment fails to consider intangible cultural heritage elements, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's identity, yet they are entirely omitted from the assessment, representing a significant gap. Without addressing these factors, it is impossible to fully understand the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics recognised in Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to align with established principles of participation in matters affecting cultural and environmental interests.

Another procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community without this assessment, preventing a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to account for both tangible and intangible heritage, as well as the failure to acknowledge living cultural practices, clearly diverges from policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not provide a sufficient foundation for understanding the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the complete Social Impact Assessment raises significant concerns regarding the lawful evaluation of social impacts, health, and wellbeing. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the absence of the full report results in a critical evidential gap. This lack of transparency denies both the public and the competent authority the ability to fully comprehend the social risks highlighted in the developer's own research.

Residents have already begun to experience measurable stress, anxiety, and concern due to the scale and proximity of the proposed development, as shown through direct

engagement. These impacts are not speculative; however, the non-disclosure of the comprehensive assessment limits the capacity for proper scrutiny of the findings. As a result, the significance of these social impacts within the decision-making process remains undetermined.

Moreover, the proposal is viewed as a direct threat to the community's identity and cohesion, with concerns over "cultural loss" emerging from the developer's findings. Despite this recognition, the application fails to incorporate these impacts adequately or assign them appropriate weight. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency severely undermines the Environmental Impact Assessment process. An extensive understanding of the social, economic, and health impacts is crucial for developments of such magnitude, especially where community character and functioning may be at stake. By omitting the full dataset, the application lacks a comprehensive evidential basis to assess the balance between potential benefits and harms.

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

The implications of these procedural shortcomings are profound. The competent authority is unable to conduct a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This oversight constitutes a material omission within the application and fails to meet the evidential requirements dictated by the Environmental Impact Assessment framework.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This circumstance obstructs a lawful determination and underscores that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape in the application is inadequate and does not accurately portray the extent of change nor the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, lack of development, and pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shoreline would establish a continuous and overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

There are significant concerns regarding the methodology used to select and present

visual viewpoints. Evidence indicates that these viewpoints might not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning notable cultural heritage sites and valuable landscapes. This raises the risk that the assessment has understated the magnitude of visual impact, which compromises the reliability of the findings.

Furthermore, the application fails to recognise the interconnectedness of the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities, neglecting their interdependence, and thus providing an incomplete picture of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural spaces and historic assets. The scale of the proposed change conflicts with the requirement to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case assessment further calls into question compliance with relevant policies.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be assertive and inescapable. Consequently, the change introduced would be fundamental and permanent, not amenable to acceptable mitigation efforts.

In summary, the assessment fails to accurately capture the magnitude of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a dependable evaluation and affirm the conclusion that the proposal is at odds with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application for the proposed works is fundamentally flawed due to its incomplete assessment of construction and pollution risks, which lacks the necessary detail to properly evaluate the likely environmental effects. It proposes significant seabed preparation and installation activities in a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on vague mitigation and contingency measures that will be developed after consent, undermining any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future actions is alarmingly problematic, especially considering the vulnerability of the West Lewis coastline, which features clean coastal

waters and vital habitats susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it does not offer sufficient detail on preventative, control, or monitoring measures.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the assessment of whether adequate safeguards are in place to manage pollution events. This creates procedural risks and compromises the competent authority's ability to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards conflicts with the mandates of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to granting consent, and in the absence of this critical 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 lack of clearly defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts render the assessment severely deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks, thereby reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, both of which are inadequately addressed in the application. The assessment of fisheries and marine life fails to provide a comprehensive evaluation of the ecological and socio-economic impacts associated with the proposal. It does not sufficiently demonstrate that these vital uses and habitats can be safeguarded from significant disruption.

A crucial flaw lies in the assumption that fishing activities can be displaced without any adverse consequences. The lack of evidence supporting the availability or accessibility of alternative fishing grounds capable of accommodating additional pressure is a serious oversight. This gap in the assessment is particularly concerning, as displacing fishing activity risks overfishing in other areas, potentially leading to broader economic ramifications for the local fleet. Without a detailed and evidence-based analysis, the

implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, primarily due to the underwater noise generated during construction. The prolonged use of high-energy hammer piling is likely to create disturbances over considerable distances, impacting species such as dolphins. The application underestimates the predicted disturbances affecting a significant portion of the local bottlenose dolphin population, which raises alarming concerns, particularly as it lacks sufficient supporting evidence to justify this downplaying of potential impacts.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is recognised, yet the impacts are simultaneously characterised as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in light of anticipated harm that may require legal authorisation.

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

From a policy perspective, the application fails to demonstrate compliance with the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, hindering any assertion that the proposal aligns with sustainable development principles.

In summary, the deficiencies highlighted, including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions, lead to an incomplete and unreliable assessment. These shortcomings preclude a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed assessment of onshore infrastructure is fundamentally incomplete and neglects the comprehensive impacts associated with what is fundamentally one integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately, leading to a fragmented understanding that obscures the overall environmental and socio-economic repercussions.

Included within the onshore components are the cabling that will traverse protected moorland, the construction of a substation in the vicinity of Stornoway, and the associated access infrastructure that cuts through sensitive landscapes. These activities necessitate excavation in areas of deep peat, especially within Barvas Moor, an important carbon sink and ecologically significant habitat. The application lacks a

thorough assessment of these impacts, inhibiting a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of onshore impact assessments hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered in unison, yet the disaggregation of offshore and onshore components means that the total impacts on peatlands, habitats, and local communities remain poorly understood.

There are notable risks to vulnerable habitats, including machair systems and peatland environments, which are protected under existing policy. The application falls short of demonstrating that impacts on these sensitive areas have been fully assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or show that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application fails to provide evidence that necessary consents or processes have been undertaken, leading to doubts about the project's feasibility and legal compliance.

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

In summary, the division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application deficient and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that would be visible over considerable distances, creating an intrusive “wall of light” effect across the western horizon. This alteration to the night-time environment is significant, particularly as the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. The importance of preserving dark skies is underscored by the area's identity and the growth of tourism sectors such as astro-tourism.

Moreover, the Environmental Impact Assessment does not address the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that the application overlooks the potential adverse effects of aviation lighting on these species, increasing their mortality risk.

The issue is further compounded by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated hazards. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation from artificial lighting. This lack of site-specific night-time data highlights a critical gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 regarding the protection of natural spaces and environmental integrity. They also undermine the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not comply.

Critical deficiencies are evident in the evidential basis for assessment. The application lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it neglects vital impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is insufficient, preventing a thorough understanding of potential significant effects or residual impacts.

Additionally, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment constitutes a serious omission. These lapses hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that net economic benefit cannot be evidenced. Moreover, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and possibly significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making it impossible to lawfully conclude that impacts are acceptable.

The proposal would lead to substantial and irreversible changes to a sensitive landscape. Industrialisation along the Atlantic-facing coastline, the degradation of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism represent permanent alterations that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or require the submission of the missing information through relevant regulatory mechanisms.

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

Additional Comments

Worried about the influx of workers in a community already full of unmet need due to lack of resources in care, care homes, hospital, education, mental health, housing. Concerned about the damage to the environment, wildlife and landscape. Worried about the impact on island life and erosion of this culture. There is a sense of an island on all levels being sold out for quick profit and a misuse of the land, sea and people. No one wants this to happen.

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: F9D695C4

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental management, cultural considerations, and procedural compliance. Situated off the west side of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale, proximity, and design of the proposed development raise essential concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the available baseline information is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework impedes a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents any meaningful evaluation of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are significant policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and undermine the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of the project is unprecedented for this area, with large turbines positioned alarmingly close to the shoreline. This introduces considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and clarity to provide a reliable account of the likely environmental effects stemming from the proposal. The approach of using a flexible Project Design Envelope, without committing to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This undermines the integrity of the assessment and prevents a consistent worst-case scenario from being applied. As a result, the impacts described may not accurately represent what will ultimately be constructed, which impedes both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

The application places significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This implies that consent is being sought with the expectation that environmental harm will be addressed later, thereby obstructing any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. Such deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation measures are clearly established prior to decision-making.

Moreover, there are notable evidential deficiencies, including inadequate baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. This introduces uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not comply with statutory obligations.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to rule out 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 adherence to National Planning Framework 4, which includes mandates for biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that adequate safeguards are in place.

In conclusion, 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 obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally inadequate, lacking a comprehensive and reliable understanding of the ecological receptors present within the West Lewis coastal environment. This area is a biologically

active marine system, yet the baseline data provided is insufficient, and the methodologies employed do not effectively capture crucial information regarding species presence, behaviour, and habitat utilisation. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Significant omissions are evident, particularly concerning otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their utilisation of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential implications of construction disturbance, noise, and increased human activity remain inadequately evaluated. This oversight undermines any claims regarding the absence of significant effects on this species.

Further issues are present in the assessment of basking sharks, where an overreliance on aerial surveys leads to considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to appropriately incorporate or consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on sound evidence. The lack of adequate baseline data further obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Given these circumstances, it is not lawful to grant consent.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is insufficient. It does not recognise this area as a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the application treats heritage as a collection of static assets, overlooking their social, cultural, and spiritual roles in the community.

Significant shortcomings are evident in the treatment of important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places of spiritual significance. However, the assessment mischaracterises them as unchanging features, neglecting their ongoing use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, ignoring their vital place in community life.

Moreover, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, which are essential to the area's identity. The lack of consideration for these elements represents a major gap in the assessment, making it impossible to fully grasp the cultural impact of the proposed development.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples. Despite this, the process of Free, Prior and Informed Consent has not been carried out. This lack of engagement undermines the assessment's validity and does not align with principles of participation concerning cultural and environmental matters.

Additionally, a significant procedural error is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately assess the social, cultural, and economic effects on the island community. This oversight alone renders the determination unlawful.

From a policy standpoint, these inadequacies contradict National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from required policies.

Overall, the lack of consideration for living heritage, intangible cultural significance, community rights, and statutory responsibilities leads to a critical evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, failing to provide a reliable basis for understanding the true 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 legality of the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's own research.

Summaries indicate that residents are currently facing measurable levels of stress,

anxiety, and concern due to the scale and proximity of the proposed development. These findings stem from direct engagement and are thus firmly grounded in evidence rather than speculation. Nevertheless, the lack of access to the full assessment impedes proper scrutiny of the findings and limits the determination of their significance within the broader decision-making framework.

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 concerns around “cultural loss.” Despite this, such impacts have not been adequately incorporated into the primary application nor afforded the appropriate weight in the evaluation. The failure to disclose the complete Social Impact Assessment conceals the true human and social costs associated with the proposed development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By not providing the complete dataset, the application lacks the necessary evidential foundation to properly assess the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, existing evidence suggests there are adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be adequately demonstrated.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with the documented existing adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application is not underpinned by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The current application presents serious deficiencies in its assessment of construction and pollution risks, failing to provide the necessary detail for a comprehensive

evaluation of environmental effects. Significant seabed preparation and installation work is proposed in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated post-consent, thus hindering any meaningful assessment of their potential adequacy or effectiveness.

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

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

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandatory that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be made. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The proposal presents significant inadequacies in the assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters surrounding the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry. However, the application does not

adequately prove that these vital habitats and uses can be preserved without considerable disruption.

A major concern lies in the assumption that fishing activities can be relocated without adverse effects. The application lacks evidence to indicate that alternative fishing grounds exist, are accessible, or can endure increased pressure. This gap is crucial, as displacing fishing can lead to overfishing in other areas and could have broader economic ramifications for the local fishing community. In the absence of a well-founded assessment, the potential consequences for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during the construction phase. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across considerable distances, impacting species such as dolphins. Concerns regarding the predicted disturbance to a substantial portion of the local bottlenose dolphin population are serious, yet the application downplays these impacts, lacking adequate supporting evidence.

There is also a troubling inconsistency within the application itself; while it acknowledges the necessity for licences to inflict harm on European Protected Species, it simultaneously describes the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious questions about its adherence to the Habitats Regulations, especially where anticipated harm would require legal authorisation.

Furthermore, the assessment neglects to account for cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately assessed.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which hinders any conclusion about the proposal's sustainability.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies lead to an incomplete and unreliable assessment. These shortcomings inhibit a thorough evaluation of 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 proposal significantly neglects the assessment of dark skies and nocturnal wildlife, which is a serious gap in the Environmental Impact Assessment. The West Lewis

coastline is defined by its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism appeal. 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.

There is no evaluation of how this lighting might impact visual amenity, landscape character, or the experience of both residents and visitors. This is particularly concerning given the value of dark skies to the local identity and the emerging sectors of tourism like astro-tourism. The lack of consideration for these effects results in a clear deficiency in the overall landscape and environmental assessment.

Moreover, the impacts on nocturnal wildlife are not addressed. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. The application lacks any assessment of lighting impacts or studies on phototaxis, meaning it does not evaluate how aviation lighting could affect these species or contribute to mortality rates.

This issue is compounded by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and their associated risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been investigated. The absence of site-specific night-time data presents a critical shortfall in understanding the ecological impacts.

Without proper assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites may face adverse impacts. The required evidential standard to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, 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 the quality of the environment. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is a vital aspect of the environment.

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

TOURISM

The assessment of tourism impacts associated with the application is significantly lacking and fails to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The tourism industry is intrinsically linked to the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is noted in the application that 86% of visitors are attracted by scenery; however, there is no

quantitative assessment provided regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced substantial growth, escalating from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nonetheless, the application neglects to model the potential impacts of industrialising the seascape and the consequent loss of environmental quality on 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 detract from an established and expanding sector.

Moreover, the assessment disregards the significance of environmental quality in underpinning tourism, particularly the value of unspoiled landscapes and dark skies to visitor experience, as well as emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a notable gap in understanding the impacts on an acknowledged and growing segment of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate tourism impacts raises broader concerns for employment, local enterprises, and the sustainability of the community. 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 adherence to National Planning Framework 4, particularly with respect to economic impact and the requirement to illustrate net benefit. It also runs counter to strategic objectives that highlight tourism as a priority growth sector, and it does not furnish adequate evidence for the competent authority to gauge the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess environmental drivers of visitor behaviour, and acknowledge the island's economic dependency culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the requirements for sustainable development as defined by statutory duties, national policy, and evidential standards. It mirrors the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application remains deficient.

There are substantial gaps in the evidential basis for determination, including incomplete baseline data, the use of an ambiguous design envelope, and unclarified mitigation measures. Additionally, vital impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects have been overlooked. Consequently, the Environmental Impact Assessment is insufficient and fails to provide a complete understanding of potential significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment represents a significant 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.

Moreover, the proposal stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. There is also a failure to prove a net economic benefit owing to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would lead to considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and the negative impacts on tourism are permanent effects that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, combined with conflicts with policy and unresolved environmental risks, obstruct any lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or activate the relevant regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 174BF19C

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline, which raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The development is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The application fails to provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts associated with this proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly relate to the statutory tests required for consent and undermine the capacity of the competent authority to conclude that the development is acceptable in policy terms.

Taken together, the absence of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In these circumstances, it is imperative that the precautionary principle applies.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are connected. However, the assessment of cultural heritage and community identity is inadequate. It treats heritage as isolated and static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active places of burial and spiritual practice. Yet, they are categorised as static features in the assessment, which fails to consider their continued use and the development's impact on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and disregards their importance to community life.

Additionally, the assessment neglects intangible cultural heritage like the Gaelic language and traditions, as well as the community's longstanding relationship with the coastal environment. These elements are central to the area's identity but are entirely absent from the evaluation, resulting in a significant oversight. Without addressing these factors, the true cultural impact of the development cannot be grasped.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been consulted through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. This omission hinders the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

From a policy standpoint, these deficiencies conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to recognise living cultural practices, clearly deviates from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not sufficiently support an evaluation of the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is severely lacking, failing to adequately reflect both the sensitivity of the receiving environment and the scale of the proposed changes. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines close to the shoreline would result in a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The proposal does not adequately convey the extent of this visual change. The proximity and scale of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and erode

the defining attributes of naturalness and remoteness. Moreover, the assessment fails to fully articulate the significance of these impacts in the context of such a sensitive landscape.

Methodological issues are also present in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, thus compromising the reliability of the assessment.

There is a notable deficiency in recognising the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are linked to the wider landscape through visual and spatial relationships to the Atlantic horizon. The assessment treats these important cultural assets as isolated rather than acknowledging their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The potential industrialisation of the seascape could sever these crucial relationships, transforming the context in which heritage assets are perceived and interrupting their connection to the natural horizon. This not only constitutes a visual impact but also represents broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change proposed is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further undermines any assertions of policy compliance.

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

Overall, the assessment fails to accurately portray the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

TOURISM

The evaluation of tourism impacts is significantly lacking and does not address 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, nearly pristine landscapes,

dark skies, and its sense of remoteness. The application notes that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen substantial growth, rising from £65 million in 2017 to more than £81.5 million, which supports over 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 a decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would offer a net economic benefit or harm an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in comprehending the impacts on a recognised and developing segment of the local economy.

In a community like the island, which has limited economic diversification, the neglect of tourism impact assessments has broader consequences 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 evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the obligation to show net benefit. It also contradicts strategic objectives that designate tourism as a key growth sector and lacks sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and acknowledging the island's economic dependence create a significant evidential gap. This hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm 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.

Additional Comments

This must not happen. Keep it to 1 area of Scotland - keep western isles as is..do not destroy views or tourism

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: 6DBC2F4D

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 application cannot be deemed to comply with the evidential threshold mandated under the Habitats Regulations, which necessitates the exclusion of adverse effects beyond reasonable scientific doubt. This situation calls for the application of the

precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity. It remains unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed subsequently obstructs any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation before determination.

Additionally, there are considerable evidential deficiencies present, such as gaps in baseline data and limitations in methodology, which are coupled with a reliance on assumptions instead of site-specific evidence. This results in ambiguity regarding the scale and significance of impacts, especially when negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

The Environmental Impact Assessment Report is materially deficient, failing to furnish a full, transparent, or reliable account of the probable environmental effects of the proposal. The employment of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, injects significant uncertainty into the process and inhibits a consistent application of a worst-case scenario. This undermines the integrity of the assessment and obscures the true extent of environmental effects, preventing both public understanding and competent authority assessment.

In summary, the combination of reliance on an undefined design envelope, absence of specific mitigation measures, and insufficient baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority incapable of determining the application based on the information provided.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm raises serious concerns regarding sustainable development, failing to meet the necessary statutory duties, national policy, and evidential standards. This application echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, as it presents an unacceptable level of industrialisation despite a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant shortcoming of the application is its lack of a complete and reliable evidential basis for determination. Key gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted impact pathways concerning nocturnal wildlife, full onshore infrastructure, and tourism effects compromise the integrity of the Environmental Impact Assessment. This inadequacy prevents a comprehensive understanding of the potential significant effects or residual impacts of the proposal.

Moreover, there are evident procedural failures. The lack of a compliant Island Communities Impact Assessment violates statutory obligations set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal also contradicts the National Planning Framework 4 by failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not adequately address health and wellbeing impacts or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring potential impacts 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, along with internal inconsistencies, indicate that the necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, preventing any lawful conclusion that impacts are acceptable.

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, disruption of cultural and visual relationships, and negative impacts on tourism represent enduring effects that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is therefore requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2821DAA0

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 for marine licensing and Environmental Impact Assessment. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies across planning, environmental, cultural, and procedural aspects. This development is proposed off the west side of the Isle of Lewis, an area that boasts an Atlantic-facing coastline, a near-pristine environment, and a strong cultural heritage. 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 a solid evidential foundation for a lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Furthermore, essential components of the proposal remain unspecified. The reliance on a flexible design framework obscures potential significant effects, and the undefined mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, leaving the claims of negligible or non-significant effects unsubstantiated by adequate evidence.

Policy conflicts are evident and substantial. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements designed to protect biodiversity, climate concerns, and environmental integrity. These discrepancies challenge the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain the proposal's policy acceptability.

This application is unprecedented in its scale for this particular location, as it proposes large turbines situated near the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental effects. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance reveal that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency to properly evaluate the likely environmental effects of the proposal.

The flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates considerable uncertainty. This ambiguity hampers the ability to apply a worst-case scenario consistently, undermining the reliability of the assessment and failing to convey the true scale of potential environmental impacts to both the public and the relevant authorities.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to adhere to the requirements of the Environmental Impact Assessment regime. Rather than offering a detailed and reasoned evaluation of viable alternatives based on their environmental impacts, it merely recounts the project's development history. This method does not adequately demonstrate that less damaging options have been properly identified or evaluated in favour of more harmful solutions.

There is a clear absence of transparent and evidence-based comparisons of different offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining environmental effects make this lack of analysis particularly concerning. Consequently, it is impossible to conclude that the proposed siting is the least damaging option.

These inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been thoroughly examined to mitigate impacts on sensitive sites, including culturally and spiritually significant areas like Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of a comparative analysis imply that the application has not effectively applied mitigation by design, instead relying on mitigation measures that would only be implemented after design completion.

As a result, the application does not demonstrate that environmental harm has been adequately minimised through careful site selection, layout, and infrastructure routing. This represents a neglect of the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. In the absence of a comprehensive alternatives assessment, it is not possible to conclude that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, these deficiencies significantly compromise compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a crucial omission that underlines the overall conclusion that the application has not been thoroughly evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This area represents a sensitive and biologically vibrant marine system, yet the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not establish a solid evidential foundation for evaluating impacts.

A significant shortcoming involves otters, a species afforded protection under European law, as the application inadequately acknowledges and assesses their active utilisation of coastal regions for foraging and movement. This oversight regarding their core foraging range and behaviour results in an insufficient evaluation of the potential effects stemming from construction disturbances, noise, and heightened activity. As a

result, the conclusions regarding the absence of significant effects on this species are fundamentally undermined.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate a regular occurrence of these sharks in the waters concerned. The neglect to incorporate or adequately consider such data culminates in an incomplete baseline, further eroding the reliability of the conclusions drawn.

These methodological shortcomings indicate that the assertions of negligible or non-significant effects rely more on assumptions than on sound evidence. The lack of adequate baseline data also hinders a meaningful analysis of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This results in considerable uncertainty about the actual extent of risk posed to marine species and their habitats.

From a regulatory standpoint, the application fails to satisfy the stipulations of the Environmental Impact Assessment regime as well as the National Planning Framework 4, due to the improper identification and assessment of protected species. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond a reasonable scientific doubt, invoking the precautionary principle. Under these circumstances, it is not legally permissible to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application proposes the development of turbines situated within a key migratory corridor on the west coast of the Isle of Lewis, an area that is home to internationally significant seabird populations, many of which are already experiencing decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that compromise its conclusions. The assessment fails to adequately demonstrate that these seabird species will not be adversely affected, particularly regarding important foraging areas and migratory pathways. It does not sufficiently evaluate the risks associated with displacement, collision, or habitat loss.

A notable contradiction arises within the application, as 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 doubts about the reliability of the

assessment, suggesting that the conclusions drawn are not supported by the underlying evidence. Additionally, the assessment lacks adequate evidence to confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial significance of these feeding grounds is not fully acknowledged, and the reliance on modelling methods creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the positioning of turbines within a recognised migratory corridor introduces an additional and substantial risk, effectively acting as a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications 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 satisfy the evidential standard required to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

The identified deficiencies further reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings inhibit a thorough evaluation of potential impacts and contribute to the conclusion that the application fails to meet the statutory requirements necessary for a favourable determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

Moreover, the assessment fails to account for intangible cultural heritage, including the

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current evaluation of social impacts, health, and wellbeing is lacking in transparency and is materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report has not been published. This omission creates a significant evidential gap, making it difficult for both the public and the competent authority to grasp the full range of social risks identified by the developer's research.

Available summaries suggest that residents are facing measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are not speculative in nature. Nonetheless, the failure to release the complete assessment inhibits thorough scrutiny of the findings and restricts the ability to evaluate their significance in the decision-making process.

Moreover, the proposal is seen as a threat to community identity and cohesion, with

concerns about "cultural loss" highlighted in the developer's findings. Despite this, these social impacts have not been adequately integrated into the application or afforded the necessary weight. The absence of the full Social Impact Assessment clouds the understanding of the genuine human and social costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is critical for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a thorough evidential basis to assess the balance of benefits and harm.

From a policy viewpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. It is essential for developments to support positive health outcomes and mitigate harm; however, the evidence available indicates that adverse effects already exist and have not been fully revealed. Without the complete assessment, demonstrating compliance with this policy is not achievable.

The procedural consequences are notable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This lack of information constitutes a material omission within the application and fails to meet the evidential standards required by the Environmental Impact Assessment framework.

In conclusion, the failure to disclose the complete Social Impact Assessment, along with evidence of existing adverse effects, results in an incomplete and unreliable assessment. This undermines the ability to make a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts on the West Lewis coastline is fundamentally inadequate, failing to capture the significant scale of change and the sensitivity of the surrounding environment. This coastline is characterised by its unspoiled Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The introduction of large-scale turbines close to the shoreline would create an overwhelming industrial presence that would fundamentally change this character and lead to a permanent transformation of the landscape.

Furthermore, the application does not sufficiently address the extent of this visual change. The turbines' size and proximity would dominate the views from residential areas, historic sites, and popular coastal locations, leading to a detrimental impact on visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment inadequately conveys the significance of these impacts within the context of such a delicate landscape.

There are also significant methodological issues regarding the selection and depiction of visual viewpoints. Evidence indicates that these viewpoints may not accurately capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the true magnitude of visual impact has been minimised, calling into question the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and severing their ties to the natural horizon. This represents not only a visual concern 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 National Planning Framework 4 concerning the protection of natural environments and historic assets. The magnitude of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a comprehensive worst-case assessment further weakens any argument for policy compliance.

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

In summary, the assessment falls short of accurately depicting the scale of impact, the environmental sensitivity, and the interrelation of landscape and heritage. These shortcomings hinder a dependable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is lacking. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, as the application depends on mitigation and contingency measures that will be prepared after consent. This reliance on undefined future measures raises concerns, especially given the sensitivity of the receiving environment. The West Lewis coastline has clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination.

The application notes risks such as sediment mobilisation and accidental chemical or oil spills but does not adequately detail how these risks will be prevented, controlled, or monitored. Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, including the potential effects on sensitive marine species and habitats.

Furthermore, the absence of detailed emergency response procedures adds to these issues. By postponing contingency planning until after consent, the application limits the evaluation of whether adequate safeguards are in place to manage pollution events. This approach introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the absence of such information means a lawful determination cannot be achieved. The application does not demonstrate compliance with the policy requirements concerning environmental protection and water quality. Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts make the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal lacks a robust assessment of fisheries and marine life, failing to adequately evaluate the ecological and socio-economic impacts associated with the development. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a functioning fishing industry; however, the application does not provide assurance that these habitats and uses will be protected or maintained without significant disruption.

A critical flaw lies in the assumption that fishing activities can be displaced without repercussions. The application offers no evidence that alternative fishing grounds are available or capable of sustaining the additional pressure resulting from such displacement. This oversight is particularly concerning, as it poses a risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species, primarily due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended period is likely to cause disturbance across considerable distances, thereby affecting species including dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises

critical concerns, yet the application minimises these effects without sufficient supporting evidence.

Additionally, the application demonstrates a clear inconsistency by acknowledging 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 serious concerns about compliance with the Habitats Regulations, particularly where harm is anticipated to the extent requiring legal authorisation.

Moreover, the assessment does not take into account the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which prevents any determination that the proposal represents sustainable development.

In summary, the deficiencies relating to the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These shortcomings inhibit a thorough evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

combined impacts on peatlands, habitats, and local communities effectively.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the identity of the region and to emerging tourism sectors such as astro-tourism, this oversight presents a significant gap in the overall landscape and environmental assessment.

Additionally, the absence of an evaluation of impacts on nocturnal wildlife raises further concerns. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to

disorientation and increased collision risks. The lack of a lighting impact assessment or a phototaxis study fails to examine how aviation lighting may impact these species and increase mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not capture nocturnal activity or associated risks. For instance, 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 creates a critical gap in understanding the ecological impacts.

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

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

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support 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 fails to meet the statutory duties and standards required for sustainable development. This application mirrors the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not provide a comprehensive or reliable evidential foundation for decision-making.

Critical gaps exist in baseline data, and the application continues to rely on an undefined design envelope. Furthermore, it leans on unspecified mitigation measures while neglecting vital impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the effects on tourism. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a thorough understanding of the likely significant effects and residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment is a violation of statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete 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.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage. The application fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative impacts of offshore and onshore components have not been thoroughly evaluated, clouding the assessment of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and may be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistently reported. The necessary evidential standard to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

Additionally, the proposal would bring about considerable 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 adverse effects on tourism indicate permanent consequences that cannot be satisfactorily mitigated.

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

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

Additional Comments

It is difficult to think of any positives arising from the proposals. The proximity to the shore (3miles) is an insult to every inhabitant in the north and west of the island. No community should be put upon in this way. It HAS to be the responsibility of government to ensure that the wellbeing of the community comes before the financial benefits of any large corporation.

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: 3BE74916

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for consideration under the relevant marine licensing and Environmental Impact Assessment regimes. It is grounded in a thorough examination of the Environmental Impact Assessment Report and accompanying documentation, revealing material deficiencies across 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 scale, proximity, and design of the project, particularly its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application does not present a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, with baseline information being both limited and inconsistent. Moreover, significant aspects of the proposal remain undefined, and the use of a flexible design framework hinders a clear assessment of potential significant effects. The reliance on unspecified mitigation measures raises questions about their effectiveness, leading to an inability to fully understand the environmental, cultural, or community impacts. Consequently, claims suggesting negligible or non-significant effects lack robust evidential support.

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 fails to prove that national requirements to protect biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly impact the statutory tests required for consent and compromise the capacity of the competent authority to determine the acceptability of the development in policy terms.

Unprecedented in scale for this location, the proposal involves large turbines situated in close proximity to the shoreline, which raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates 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 Environmental Impact Assessment Report lacks the necessary thoroughness and transparency, failing to present a reliable overview of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates significant uncertainty. This uncertainty impedes the consistent application of a worst-case scenario analysis, thereby compromising the assessment's integrity. As a result, the potential impacts may not accurately represent what will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the full extent of environmental consequences.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought under the premise that any environmental harm will be mitigated in the future, obstructing a thorough evaluation of these measures' effectiveness or an assessment of any residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, as it contradicts the fundamental purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

Moreover, there are substantial evidential shortcomings present, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in ambiguity concerning the scale and significance of impacts, especially where negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, failing to satisfy requirements relating to biodiversity protection and environmental integrity, as it cannot confirm that impacts have been comprehensively assessed or that appropriate safeguards are implemented.

Overall, the combination of reliance on an unspecified design envelope, lack of defined mitigation measures, and the gaps present in baseline data contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally inadequate and fails to fulfil the statutory obligations set by the Environmental Impact Assessment regime. It does not provide a structured or reasoned evaluation of viable alternatives based on environmental implications. Instead, the application merely offers a narrative description of the project's development. This method does not demonstrate that less harmful alternatives have been properly identified, assessed, and chosen over more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding offshore locations, development scales, or design configurations. The application does not convincingly show that the developer has genuinely explored the possibility of positioning turbines further offshore, an option that could likely minimise visual, ecological, and coastal impacts. The West Lewis coastline's sensitivity, along with the critical relevance of proximity to shore in determining environmental impact, underscores the significance of this lack of analysis. Consequently, it is impossible to ascertain whether the proposed siting is indeed the least damaging option available.

This inadequacy extends to the examination of cable routing and landfall assessment. There is insufficient evidence that alternative routes have been explored adequately to avoid or lessen impacts on sensitive areas, including culturally and spiritually significant sites like Barvas Cemetery. The absence of a defined strategy for avoidance and the lack of comparative analysis suggest that mitigation through design has not been employed, relying instead on measures to mitigate after the design phase.

The failure to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure signifies a disregard for the established mitigation hierarchy. This shortcoming prevents the competent authority from determining the existence of less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal presents a sustainable or policy-compliant solution.

From a policy viewpoint, this deficiency raises significant concerns regarding compliance with National Planning Framework 4, especially in terms of safeguarding natural areas, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a material omission that supports the conclusion that the application has not been sufficiently evaluated, thus cannot be legally determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to provide a reliable assessment of marine ecology and protected species, particularly within the highly sensitive West Lewis coastal environment. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidence to evaluate potential impacts accurately.

A notable gap is found in the assessment of otters, a European Protected Species, where the application does not appropriately acknowledge their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leaves the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This undermines any conclusions suggesting no significant effects on the otter population.

In addition, the assessment of basking sharks is flawed due to its reliance on aerial surveys, which are subject to substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence compared to established land-based observations, which indicate frequent use of these waters. The omission of such relevant data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Without adequate baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not adhere to the Environmental Impact Assessment regime or National Planning Framework 4 standards, as there has been a failure to properly identify and assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Thus, under these circumstances, consent cannot be granted lawfully.

Overall, the lack of complete baseline data, flawed methodologies, and unsupported conclusions collectively undermine the assessment's reliability. These issues obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application is founded on insufficient evidence.

ORNITHOLOGY AND SEABIRD IMPACTS

The application does not satisfy the evidential threshold required to demonstrate no adverse effect on the integrity of protected sites. There are significant gaps in evidence, internal inconsistencies, and methodological weaknesses that undermine the reliability of the ornithological assessment. The assessment fails to adequately evaluate the implications of displacement, collision risk, and habitat loss for internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline. The application suggests that no significant adverse effects are anticipated, yet it simultaneously puts forward a Habitats Regulations derogation case, which implies that significant harm is expected. This contradiction raises serious concerns about the validity of the assessment's conclusions.

Furthermore, the assessment does not sufficiently demonstrate that seabirds

associated with protected sites, including the Lewis Peatlands and St Kilda, will not be adversely impacted. The significance of these feeding grounds is not fully considered, and the reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are experiencing severe declines. The methodologies used are likely to underestimate potential mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

The siting of turbines in a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations been considered.

Collectively, these deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. The overall conclusion is that the assessment is unreliable due to its internal inconsistencies and insufficient evidence, which prevents a thorough evaluation of impacts and indicates that the application does not meet the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is fundamentally flawed, failing to account for the scale of change and the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness, would be irreversibly altered by the introduction of large-scale turbines near the shoreline. This would create a continuous industrial presence that drastically transforms the area's character.

Moreover, the application inadequately conveys the extent of the visual change. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thereby negatively affecting visual amenity and compromising the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This shortcoming raises the possibility that the visual impacts have been understated, compromising the reliability of the overall assessment.

Additionally, the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage represents a further deficiency. Important

sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. By treating these assets as isolated, the assessment overlooks their interdependence, resulting in an incomplete understanding 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 impact is not limited to the visual realm; it encompasses broader cultural and spatial harm that has not been thoroughly examined in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, particularly in terms of protecting natural places and historic assets. The scale of the proposed changes is incompatible with the imperative to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further diminishes any assertion of compliance with policy requirements.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. The resultant changes are thus fundamental and permanent, rather than reducible to an acceptable level through mitigation measures.

Collectively, these deficiencies illustrate that the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. Consequently, this undermines a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks crucial detail necessary for a comprehensive understanding of the environmental risks associated with construction and pollution. Significant seabed preparation and installation activities are proposed within a challenging high-energy Atlantic environment; however, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans presented. Instead, the application relies on unspecified mitigation and contingency measures that would be prepared only after consent is granted, which severely limits the ability to assess their adequacy or effectiveness at this stage.

Particularly alarming is the proposal's failure to adequately consider the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are susceptible to sediment disruption and contamination. While the application acknowledges the potential risks of sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail the preventative, control, or monitoring measures that would be put in place to address these risks.

There is significant uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these disturbances. This uncertainty extends to potential impacts on marine species and habitats, which have already been identified as sensitive within the broader assessment context.

Moreover, the absence of detailed emergency response procedures adds to the growing concerns surrounding this application. By postponing contingency planning until after consent, the proposal hinders an evaluation of whether adequate safeguards are established for responding to pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess the environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the requirements set forth by the Environmental Impact Assessment regime. It is critical that likely significant effects and mitigation strategies are assessed prior to consent; without this information, a lawful determination cannot be achieved. The application also falls short of demonstrating compliance with policy requirements related to environmental protection and water quality.

In summary, the application's deficiencies—including the lack of defined mitigation measures, the absence of detailed management plans, and uncertainties surrounding potential impacts—render the assessment materially inadequate. These issues prevent a solid evaluation of construction and pollution risks and support the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The proposal fails to provide a thorough evaluation of the socio-economic impacts and ecological effects on the local marine life and fishing industry. The waters off the West Lewis coast host a rich marine ecosystem, yet the application does not adequately demonstrate how these vital habitats can be preserved without substantial disruption.

One of the main concerns is the flawed assumption that fishing activities can be relocated without repercussions. There is a notable lack of evidence regarding the availability and accessibility of alternative fishing grounds that can bear additional pressures. This critical omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. The absence of a comprehensive assessment impedes a true understanding of the impacts on fisheries and local livelihoods.

The proposal also poses significant threats to marine species, particularly due to the underwater noise associated with construction activities. The use of high-energy hammer piling over an extended duration is likely to create disturbances that affect marine life, notably the local bottlenose dolphin population. Concerns have been raised about the anticipated disturbance to a significant portion of this population, yet

the application downplays these potential effects and lacks sufficient evidence to support its claims.

Moreover, there is an apparent contradiction within the application itself. While it acknowledges the necessity of licences to allow harm to European Protected Species, it simultaneously characterises the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

The assessment does not adequately account for cumulative impacts from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a detailed consideration of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It does not sufficiently prove that the proposed development can coexist with current marine users or avoid significant adverse effects on marine biodiversity, thereby failing to support the notion of sustainable development.

Overall, the absence of concrete evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions found within the assessment lead to a conclusion that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the implications for marine life and local fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a series of significant concerns regarding its treatment of onshore infrastructure, which is assessed in isolation from the offshore components of the project. This fragmented approach obscures the true environmental and socio-economic impacts, as the onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and the required access infrastructure, are intrinsically linked to the offshore turbines.

A critical element of the onshore infrastructure is the excavation across areas of deep peat, particularly in Barvas Moor, which serves as both an ecologically sensitive habitat and a substantial carbon store. The failure to provide a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint, leaving essential questions unanswered.

Moreover, the application does not adequately consider the cumulative effects of separating the assessments for offshore and onshore components. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively. Consequently, the separation prevents a thorough understanding of the

combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, are at risk, and the application falls short in demonstrating that these impacts have been fully assessed or that necessary avoidance measures are in place. This oversight highlights a significant gap in the evidence required for biodiversity protection. Additionally, the disturbance of peatland raises concerns about carbon balance, as released stored carbon could create a carbon debt, undermining the aims of renewable energy initiatives.

There are also serious implications for land use, particularly with the routing of infrastructure through active croft land. The application lacks evidence that it has obtained the necessary consents or initiated appropriate processes, which raises questions about the feasibility and legality of the project.

From a policy standpoint, the failure to evaluate the project as an integrated whole, coupled with the inadequate protection of peatlands, habitats, and land use rights, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation strategies further weakens the application.

In summary, the lack of comprehensive assessment and the separation of project components, along with insufficient evidence regarding environmental and land use impacts, renders this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposed project would introduce permanent red aviation lighting, visible from great distances, leading to a disruptive “wall of light” effect across the western horizon, fundamentally changing the night-time landscape.

Furthermore, the application fails to assess how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning considering the role that dark skies play in the region's identity and the potential for growth in tourism sectors such as astro-tourism. The lack of consideration for these impacts indicates a notable deficiency in the overall landscape and environmental assessment.

Additionally, the proposal does not evaluate the effects of artificial lighting on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study means there is no analysis of how aviation lighting

could affect these species or potentially raise mortality rates.

This issue is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and related risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this has not been evaluated. The lack of site-specific night-time data highlights a significant gap in understanding the ecological consequences.

In the absence of an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be negatively affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, the omission is in conflict with National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. This failure also compromises the broader evaluation of landscape and seascape impacts, as night-time character is a fundamental aspect of the environment.

Collectively, the lack of assessment concerning 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 insufficient for a lawful determination.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. It reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

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

The procedural shortcomings are also significant. The absence of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018. Moreover, the failure to provide a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on

community wellbeing, cultural identity, and economic resilience. These issues render the application unfit for determination.

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

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

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

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

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

Additional Comments

Although I live in Dumfries & Galloway, our family have a small house on Lewis. Travelling frequently from D&G to Glasgow I see hundreds of wind turbines. Although I don't think they are ugly, there must come a time when enough is enough. Where is the proof that they don't damage birds? They will be almost invisible in the mist and low cloud on the sea so birds will hit them. The seabed will also be disturbed and you don't know how the noise pollution in the sea will affect marine mammals.

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: 6D0E270D

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. It is informed by a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant material deficiencies related to planning, environmental concerns, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a robust evidential foundation necessary for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures the potential for understanding likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the provided documentation falls short of enabling a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack sufficient supporting evidence.

There are evident and significant conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and well-being. It fails to establish compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These policy conflicts directly challenge the statutory tests required for consent and compromise the capacity of the competent authority to determine the development's acceptability within a policy context.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Taken together, the insufficient information, dependence on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance reveal that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks sufficient detail and does not adequately account for the potential environmental effects of the proposal. The reliance on a flexible Project Design Envelope, without fixed turbine dimensions, layouts, or configurations, creates significant uncertainty. This undermines the assessment's integrity, as the impacts discussed may not accurately represent the development that is ultimately constructed. Consequently, both the public and the competent authority are left unable to grasp the true extent of the environmental effects.

The application places heavy reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be addressed later hampers any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which stipulates that likely significant effects and mitigation strategies should be clearly identified before a determination is made.

Moreover, there are notable evidential deficiencies present, including gaps in baseline data, methodological limitations, and a dependence on assumptions instead of site-specific evidence. These issues lead to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are claimed without robust 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.

As a result, the application does not meet the evidential threshold set 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 demonstrate compliance with National Planning Framework 4, specifically in relation to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

Overall, the dependence on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data all contribute to making the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species lacks completeness and reliability, failing to provide an accurate understanding of the ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system, yet the baseline data is insufficient. The

methodologies employed in the assessment do not adequately capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap in the assessment concerns otters, classified as a European Protected Species. The application does not appropriately recognise or evaluate their active use of coastal regions for foraging and movement. The omission of crucial factors such as their core foraging range and behavioural patterns undermines the assessment of potential effects arising from construction disturbances, noise, and heightened activity. This oversight diminishes the validity of any conclusions regarding the absence of significant impacts on this species.

Furthermore, there are notable deficiencies in the evaluation of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions, which is likely to lead to an underestimation of their presence. This situation is compounded by established land-based observations that indicate frequent use of these waters. The failure to adequately consider this data results in an incomplete baseline, thereby weakening the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions asserting negligible or non-significant effects appear to be based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This leads to uncertainty about the true risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been duly identified or assessed. The introduced uncertainty hinders the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant gaps in evidence and internal contradictions that cast doubt on its findings. It is essential to recognise that the west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already in decline. Despite this, the application does not adequately demonstrate that these species will remain unaffected by the proposed development, particularly given its location within key foraging areas

and migratory pathways. The assessment fails to properly evaluate the risks associated with displacement, collision, and habitat loss.

There exists a fundamental contradiction within the application, where the developer asserts that no significant adverse effects will occur while also presenting a Habitats Regulations derogation case, which is only relevant if significant harm is anticipated. This inconsistency undermines the reliability of the assessment and highlights that its conclusions lack support from the available evidence. The application does not offer sufficient evidence to assure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds has not been thoroughly considered, and the dependence on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies used likely underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

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

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and methodological limitations, indicates that the requisite standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prohibits a lawful conclusion in support of consent. Moreover, these deficiencies indicate non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal 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 shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements necessary for a valid determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the impacts on seascape, landscape, and visual elements is insufficient. It does not properly consider the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon and an undeveloped character, which contributes to a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would create an industrial presence that alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately depict the scale of visual change. The turbines' size and proximity mean they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would harm visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its significance within such a sensitive landscape.

Methodological issues arise from the choice and presentation of visual viewpoints. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests a risk that the visual impact has been underestimated, compromising the assessment's reliability.

Another notable flaw is the lack of an evaluation of the connections between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as separate entities, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts the National Planning Framework 4, particularly regarding the protection of natural areas and historic assets. The extent of change does not align with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of compliance with policy.

Moreover, the identified impacts cannot be effectively mitigated. Given the turbines' size, height, and proximity, their presence would be dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that can be reduced 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 interconnected 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.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is materially deficient and does not include the detail needed to understand the likely environmental effects. The proposal entails significant seabed preparation and installation activities in a high-energy

Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, which hinders a meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly alarming. 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 the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to furnish adequate details on how these incidents will be prevented, controlled, or monitored.

There is significant uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive within the wider assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application prevents the evaluation of whether suitable safeguards are established to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and the absence of this information means that a lawful determination cannot be achieved. The application also does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with this application is inadequate and does not provide a thorough evaluation of the ecological or socio-economic impacts involved. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to prove that these vital uses and habitats can be protected or maintained without

significant disruption.

A major concern arises from the assumption that fishing activity can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can sustain additional pressure. This is a significant oversight, as such displacement could lead to overfishing in other areas and potentially harm the local fishing fleet's economic viability. Without a sound and evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, primarily due to the underwater noise produced during construction. The prolonged use of high-energy hammer piling is likely to cause disturbances over large distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency within the application itself; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction calls into question the reliability of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions collectively 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 proposal includes the construction of a substation near Stornoway, cabling across protected moorland, and access infrastructure through sensitive landscapes. These onshore works involve excavation in areas of deep peat, particularly within Barvas Moor, which is known to be a significant carbon store and an ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, resulting

in an insufficient understanding of the project's overall environmental footprint.

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

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

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

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

From a policy standpoint, the project's lack of comprehensive assessment and failure to demonstrate protection for peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the validity of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism value. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no assessment of the impact of this lighting on visual amenity,

landscape character, or the experiences of residents and visitors. This gap is particularly concerning given the importance of dark skies for the area's identity and for emerging sectors such as astro-tourism. The lack of consideration for these impacts indicates a clear shortfall in the overall landscape and environmental evaluation.

Moreover, the application does not include any assessment of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means that the potential effects on these species and their mortality rates remain unexamined.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and related 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 addressed. The lack of site-specific night-time data creates a serious shortcoming in understanding ecological impacts.

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 cannot be satisfied, thus invoking the precautionary principle and preventing a lawful decision.

From a policy standpoint, this omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. Additionally, it undermines the overall evaluation of landscape and seascape impacts, as the character of night-time environments is a vital component of the ecological setting.

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

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a critical sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are fundamental to tourism, which has expanded significantly, rising from £65 million in 2017 to over £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. Despite acknowledging that 86% of visitors are attracted by scenery, the application fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Moreover, the assessment overlooks the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies is crucial for enhancing visitor experiences and tapping into emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, leaving a significant void in understanding the implications for a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to consider the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated 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 necessity to show net benefit. It conflicts with strategic objectives that designate tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

The combined shortcomings in quantifying tourism impacts, assessing environmental drivers of visitor behaviour, and recognising island economic dependency culminate in a significant evidential gap. This undermines a robust evaluation of economic effects and reinforces the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application brings forward the same fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it falls short.

There are significant gaps in the evidential basis for this proposal. The reliance on an undefined design envelope, unspecified mitigation measures, and the absence of critical baseline data hinder a thorough assessment. Key impact pathways, particularly concerning nocturnal wildlife, the full extent of onshore infrastructure, and potential tourism effects, have been overlooked. As a result, the Environmental Impact Assessment lacks completeness, leaving uncertainties about likely significant effects or residual impacts.

The procedural aspects of the application also reveal deficiencies. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duty as per the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment constitutes a significant omission. This lack of information inhibits

the competent authority from properly evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts with National Planning Framework 4, as it fails to ensure the protection of biodiversity, natural environments, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements remain inadequately assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks are concerning and may be significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, along with internal inconsistencies, fail to meet the evidential threshold required to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal threatens to cause substantial and irreversible alterations to a particularly sensitive landscape. The anticipated industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and the potential impacts on tourism are permanent effects that cannot be mitigated effectively.

In summary, the application is unfit for determination both procedurally and substantively. The combination of information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful and evidence-based decision. Therefore, the competent authority must refuse consent for the proposal or invoke relevant regulatory provisions to compel the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 042CA05F

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposed development's scale, design, and proximity to the shoreline raise serious concerns regarding its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful decision. There is a notable absence of critical environmental data, with baseline information that is both limited and inconsistent. Key components of the proposal remain undefined, which undermines the ability to assess likely significant effects. Additionally, the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident throughout the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate that it can meet national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine the development's acceptability from a policy perspective.

Furthermore, the unprecedented scale of the proposal, with large turbines located near the shoreline, raises significant issues related to landscape capacity, visual impact, and overall environmental consequences. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with established policies, it is evident that the application is incomplete and cannot support a lawful determination. In these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and does not deliver a comprehensive, transparent, or reliable account of the likely environmental consequences of the proposed development. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty compromises the integrity of the assessment and means that the impacts outlined may not accurately reflect the actual development that will be constructed. Consequently, both the public and the competent authority are unable to grasp the true extent of the environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that environmental harm will be addressed at a later stage obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and is in direct conflict with the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before any determination is made.

Significant evidential deficiencies are also present, including substantial gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application fails to meet the evidential threshold necessary under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. The proposal also does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity. It remains unproven that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, lack of specified mitigation measures, and gaps in baseline data makes the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of project evolution. This

deficiency indicates that the developer has not properly identified, assessed, or selected less harmful options over more damaging ones.

There is a notable absence of transparent comparisons regarding alternative offshore locations, development scales, or design configurations. The application does not convincingly show that the developer has considered positioning the turbines further offshore, which would likely mitigate visual, ecological, and coastal impacts. The West Lewis coastline is particularly sensitive, and the significance of proximity to shore in determining impact makes the lack of such analysis a critical flaw. Consequently, it is impossible to ascertain that the proposed siting is indeed the least damaging option.

Moreover, the shortcomings extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors. This oversight includes regions of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy or comparative analysis suggests that mitigation by design has not been adequately applied, relying instead on measures that come into play after the design phase.

As a result, the application does not demonstrate that environmental harm has been effectively minimised through site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, leaving the competent authority without a clear understanding of whether less harmful and more appropriate alternatives are available. Without a robust assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of thoroughness 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, leading to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, lacking a complete and reliable understanding of its ecological receptors. This area is a highly sensitive and biologically active marine system, yet the baseline data is insufficient and the methodologies used are inadequate for capturing species presence, behaviour, and habitat use. Consequently, the assessment does not provide a credible evidential basis for evaluating potential impacts.

A significant oversight is the failure to recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The application does not adequately consider their core foraging range and behavioural patterns, leaving the potential effects of construction disturbance, noise, and

increased activity unassessed. This deficiency undermines conclusions regarding the absence of significant effects on the otter population.

The assessment also falls short in its evaluation of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions, likely leading to an underestimation of their presence. This is further highlighted by established land-based observations that indicate these waters are frequently used by basking sharks. The neglect to incorporate such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of comprehensive baseline data obstructs the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the true scale of risks faced by marine species and habitats.

From a regulatory standpoint, the application does not adhere to the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given the improper identification and assessment of protected species. The uncertainty produced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent cannot be justified.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species and highlight the overall inadequacy of the application's 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 West Lewis coastline represents a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The assessment of cultural heritage and community identity within the application fails fundamentally, as it adopts a reductive approach by treating heritage as a collection of isolated and static assets. This perspective neglects the ongoing social, cultural, and spiritual roles that these elements play within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are merely characterised as static features within the assessment. This mischaracterisation ignores their ongoing use, significance, and the potential impact of development on their surrounding environments. Consequently, the evaluation of cultural effects remains incomplete, and the essential role these sites

hold within community life is disregarded.

The assessment further fails to account for intangible cultural heritage, which includes vital components such as the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These aspects are central to the identity of the area, yet they are completely omitted from the assessment, leading to a significant gap in understanding the cultural impact of the proposed development.

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

Moreover, a critical procedural failure exists in the absence of a compliant Island Communities Impact Assessment, a statutory requirement outlined in the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders lawful determination.

From a policy standpoint, these deficiencies conflict directly with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to recognise living cultural practices, represents a departure from policy requirements.

When viewed collectively, the shortcomings in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, leaving the application insufficient for evaluating the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the complete Social Impact Assessment significantly hinders a thorough evaluation of social impacts, health, and wellbeing, resulting in a lack of transparency that is essential for a lawful review. Although the developer initiated a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a notable evidential gap, limiting both public awareness and the competent authority's understanding of the social risks uncovered by the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the comprehensive assessment, proper scrutiny of the findings is impossible, thereby constraining the

ability to evaluate their significance in the decision-making process.

Additionally, the proposal is viewed as a potential threat to community identity and cohesion, with concerns regarding "cultural loss" highlighted in the developer's findings. Despite this recognition, these social impacts have not been adequately addressed in the main application or afforded the appropriate consideration. The failure to disclose the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. To fully grasp the social, economic, and health implications of developments of this magnitude, particularly regarding community character and functioning, a complete dataset is vital. The current application does not provide a thorough evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development proposals must promote positive health outcomes and avoid adverse impacts. However, the evidence available points to existing detrimental effects that have not been transparently communicated. Without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission in the application, failing to satisfy the evidential standards set by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of visual, seascape, and landscape impacts is severely lacking, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, which contributes to its undeveloped nature and profound sense of remoteness. The planned installation of large-scale turbines near the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The application inadequately addresses the magnitude of visual change that would occur. Due to their scale and proximity, the turbines would overpower views from residential areas, historic sites, and popular coastal locations, thus directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. This significant impact has not been properly conveyed, which is particularly

concerning given the sensitivity of the landscape in question.

Methodological issues are evident in the selection and presentation of visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the broader landscape by visual and spatial relationships with the Atlantic horizon. The evaluation incorrectly treats these assets as isolated, failing to recognise their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertions of policy compliance.

Moreover, it is evident that the impacts outlined cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Therefore, the resulting change would be fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment is inadequate in representing 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 position that the proposal is incompatible with the preservation 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 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 proposed assessment of onshore infrastructure is fundamentally incomplete and neglects the comprehensive impacts associated with what is fundamentally one

integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately, leading to a fragmented understanding that obscures the overall environmental and socio-economic repercussions.

Included within the onshore components are the cabling that will traverse protected moorland, the construction of a substation in the vicinity of Stornoway, and the associated access infrastructure that cuts through sensitive landscapes. These activities necessitate excavation in areas of deep peat, especially within Barvas Moor, an important carbon sink and ecologically significant habitat. The application lacks a thorough assessment of these impacts, inhibiting a complete understanding of the project's overall environmental footprint.

The exclusion or postponement of onshore impact assessments hampers the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered in unison, yet the disaggregation of offshore and onshore components means that the total impacts on peatlands, habitats, and local communities remain poorly understood.

There are notable risks to vulnerable habitats, including machair systems and peatland environments, which are protected under existing policy. The application falls short of demonstrating that impacts on these sensitive areas have been fully assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this concern or show that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application fails to provide evidence that necessary consents or processes have been undertaken, leading to doubts about the project's feasibility and legal compliance.

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

In summary, the division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this portion of the application deficient and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment is a significant oversight. The West Lewis coastline is distinguished by its exceptionally dark skies, which are integral to environmental quality, cultural identity, and the tourism sector. The proposal includes the installation of permanent red aviation lighting that would be visible over considerable distances, resulting in a continuous and intrusive “wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This gap is particularly notable given the critical role dark skies play in the area's identity and in emerging sectors such as astro-tourism. The lack of consideration for these impacts reveals a clear deficiency in the landscape and environmental evaluation.

Equally concerning is the absence of an assessment regarding the effects on nocturnal wildlife. Species including the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and an increased risk of collision. The application does not provide any analysis of the lighting's impact or a study on phototaxis, failing to assess how aviation lighting might affect these species and potentially elevate mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not take into account nocturnal activity or associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are at risk of disorientation due to artificial lighting; yet, this risk remains unassessed. The lack of site-specific night-time data represents a critical void in understanding the ecological impacts.

In the absence of a nocturnal impact assessment, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus 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 the maintenance of environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

Collectively, the failure to assess dark skies and nocturnal wildlife constitutes a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

TOURISM

The assessment of tourism impacts is critically inadequate, neglecting to evaluate the economic and social ramifications for a key sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, nearly untouched landscape, dark skies, and overall sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how extensive offshore infrastructure might affect visitor numbers, behaviours, or the overall economic contribution of this sector.

The tourism sector has experienced substantial growth, rising from £65 million in 2017 to more than £81.5 million, which supports over 1,000 jobs and represents up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and a decline in environmental quality would impact the Tourism Gross Value Added or broader economic resilience. Without such analysis, it remains unclear if the development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment inadequately considers the importance of environmental quality in supporting tourism, especially the value of pristine landscapes and dark skies to visitor experiences and burgeoning 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 impacts on a recognised and flourishing segment 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 businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the requirement to establish net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This hinders a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed, failing to meet the requirements of sustainable development as assessed against statutory duties, national policy, and evidential standards. It echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. Despite being presented

under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short.

There are significant gaps in the evidential basis for the proposal. The use of an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways—including nocturnal wildlife, complete onshore infrastructure, and tourism effects—render the Environmental Impact Assessment inadequate. This incompleteness prevents a comprehensive understanding of likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duties established by the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, thus deeming the application unfit for determination.

In addition, the proposal conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage. The application fails to confirm that health and wellbeing impacts are acceptable and lacks tourism impact modelling, preventing it from evidencing a net economic benefit. The assessment of cumulative impacts from both offshore and onshore elements has not been conducted properly, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to 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 satisfied, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Moreover, 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 negative impacts 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 policy conflicts and unresolved environmental risks, obstructs any lawful and evidence-based decision-making. It is essential for the competent authority to either refuse consent on these grounds or to invoke the appropriate regulatory provisions to demand the submission of 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

As a resident of South Bragar I am extremely concerned about the visual impact this development will have and the knock on effect this will have on the value of properties in the area.

I am also extremely worried about the mental health impacts on local residents in terms of noise, shadow flicker and light pollution.

I fully appreciate the need for more renewables but not at the expense of our local environment, wildlife and economy.

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: A36A3746

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. My concerns stem from a thorough review of the Environmental Impact Assessment Report and its supporting documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious doubts regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, baseline information is both limited and inconsistent, and numerous aspects of the proposal remain undefined. The reliance on a flexible design framework obscures a clear understanding of likely significant effects, while the unspecified mitigation measures make it impossible to assess their potential effectiveness. Consequently, the provided documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by robust evidence.

Moreover, there are evident and serious policy conflicts. The proposal 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 does not demonstrate that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts directly impact the statutory tests necessary for consent and compromise the competent authority's ability to affirm that the development is acceptable in policy terms.

The scale of this proposal is unprecedented in this specific location, with large turbines positioned in close proximity to the shoreline, leading to substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of adequate information, the reliance on undefined mitigation measures, the evidential weaknesses, and the clear policy non-compliance illustrate that the application is incomplete and incapable of securing a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not reliably account for the potential environmental effects of the proposal. A flexible Project Design Envelope is employed without any commitment to specific turbine dimensions or layouts, creating significant uncertainty. This uncertainty hinders a proper application of a worst-case scenario analysis. As a result, the assessment's integrity is compromised, leading to impacts that may not accurately represent the development that will ultimately be constructed. This lack of clarity prevents both the public and the competent authority from grasping the true extent of environmental effects.

Moreover, the application depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the basis that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness and leaves residual impacts unassessed. Deferring essential information to post-consent stages is not acceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires that likely significant effects and mitigation be clearly established before a determination is made.

There are notable gaps in the evidence presented, including insufficient baseline data and methodological limitations. The application also relies on assumptions rather than site-specific evidence. This introduces uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to show that impacts have been thoroughly assessed or that appropriate safeguards are established for biodiversity protection and environmental integrity.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data leads to an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings hinder a lawful and rigorous 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 thorough assessment of alternatives, which does not fulfil the requirements of the Environmental Impact Assessment regime. Instead of offering a reasoned and structured comparison of viable alternatives based on their environmental effects, it provides a narrative of project development that does not convincingly show that less harmful options have been identified, assessed, and

chosen over more damaging ones.

There is a notable absence of a transparent, evidence-based evaluation of different offshore locations, scales of development, and design configurations. Specifically, the application fails to illustrate that the developer has genuinely considered positioning the turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitive nature of the West Lewis coastline and the critical role that proximity to shore plays in determining impacts, the lack of such analysis means that no conclusion can be drawn about whether the proposed siting is the least damaging option.

This inadequacy also applies to the assessment of cable routing and landfall. There is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or reduce 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 indicate that the design process did not incorporate mitigation by design, instead relying heavily on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout planning, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is a sustainable or policy-compliant option.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a critical omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and therefore cannot support a lawful determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence creates a notable evidential gap, hindering both public understanding and the competent authority's capacity to grasp the full scope of social risks highlighted in the developer's research.

Summaries that are available reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement with the community and are therefore not mere speculation. Nonetheless, the lack of disclosure of the complete assessment

limits proper scrutiny and undermines the significance of these findings in the decision-making process.

The proposal is also viewed as a threat to community identity and cohesion, with findings indicating “cultural loss” identified in the developer’s own research. Despite these critical insights, they have not been sufficiently integrated into the main application or given the weight they deserve. The decision to withhold the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, particularly in relation to community character and functioning. Without the complete dataset, the application fails to provide an adequate evidential basis to assess the balance between potential benefits and harm.

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

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the absence of the full 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 non-disclosure of the complete Social Impact Assessment, coupled with evidence of pre-existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and emphasises that the application lacks sufficient supporting information.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

environmental footprint.

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

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

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

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the necessary requirements for sustainable development. It does not align with statutory duties, national policy, or evidential standards. This proposal repeats the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. Although the current application is presented under a stronger policy framework, it still does not adequately address biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical gaps in the evidential basis for determination. The application lacks complete baseline data, relies on an undefined design envelope, and specifies

mitigation measures that have not been fully articulated. It omits essential impact pathways concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not provide a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The absence of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018. Furthermore, not disclosing the complete Social Impact Assessment is a significant omission. These deficiencies hinder the competent authority from adequately evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the proposal remain unclear and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks precludes a lawful, evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Additional Comments

I believe that such a project should ensure that the local community receives the maximum benefit for hosting the energy generation infrastructure. Such as funding for community projects and development. The community should also benefit from cheaper electricity.

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: 5229FB52

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 presents significant shortcomings and fails to deliver a complete, transparent, or dependable account of the likely environmental consequences of the proposal. The adoption of a flexible Project Design

Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates a substantial level of uncertainty. This lack of clarity undermines the assessment's integrity, making it impossible to consistently apply a worst-case scenario. Consequently, the impacts outlined may not accurately represent the final development, hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be addressed later, it becomes impossible to conduct a meaningful evaluation of the effectiveness of these measures or to assess any residual impacts. This postponement of essential information to post-consent phases is procedurally inappropriate and contradicts the core purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established prior to decision-making.

Additionally, there are marked evidential deficiencies, including inadequate baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues result in uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust data to support them. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not satisfy the evidential threshold stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially 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, since it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects, meaning that the competent authority lacks the necessary information to make a sound determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a robust assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of viable alternatives based on their environmental effects, it presents a narrative account of how the project evolved. This approach does not adequately show that less harmful options have been properly identified, evaluated, and preferred over more damaging solutions.

There is a significant absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the proposal does not indicate that the developer has genuinely considered positioning the turbines further offshore, where the potential visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the critical role of proximity to the shore in assessing impact, the failure to include this analysis undermines any assertion that the proposed siting is the least damaging option.

The shortcomings are also evident in the cable routing and landfall assessment, where there is inadequate 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, along with insufficient comparative analysis, suggests that mitigation through design has not been effectively applied, leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it is impossible to conclude that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, lacking a comprehensive understanding of ecological receptors within the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet it is evident that the baseline data provided is incomplete. The methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat utilisation, leading to an unreliable evidential basis for evaluating potential impacts.

One notable gap in the assessment pertains to otters, classified as a European Protected Species. The application does not properly acknowledge or evaluate their active use of coastal regions for foraging and movement. By failing to consider their core foraging range and behavioural habits, the assessment inadequately addresses the potential impacts of construction-related disturbances, noise, and increased

activity, undermining any assertions regarding the absence of significant effects on this species.

Further issues are apparent in the evaluation of basking sharks, where a reliance on aerial surveys introduces substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations, which indicate a frequent utilisation of these waters. The oversight of relevant data leads to an incomplete baseline, diminishing the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions that suggest negligible or non-significant effects appear to be based on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates a level of uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to align with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not appropriately identify or assess protected species. This introduction of uncertainty prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, under these circumstances, consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, ineffective methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application does not possess a sound evidential foundation.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates significant failures in meeting the criteria for sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. Notably, the application mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable scale of industrialisation. While the current proposal is submitted under a more robust policy framework emphasising biodiversity, peatland protection, landscape integrity, and community wellbeing, it nonetheless falls short.

There are substantial shortcomings in the evidential basis provided for this application. It lacks complete baseline data and relies on a design envelope that remains undefined. Furthermore, the proposal does not specify the mitigation measures that would be applied and omits essential impact pathways, including those affecting nocturnal wildlife, the entirety of onshore infrastructure, and the implications for tourism. As a result, the Environmental Impact Assessment is incomplete, inhibiting a

comprehensive understanding of the likely significant effects and residual impacts.

In addition to these evidential gaps, there are notable procedural deficiencies. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations under the Islands (Scotland) Act 2018. Moreover, the failure to present a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal also contradicts National Planning Framework 4, as it does not adequately protect biodiversity, natural environments, and cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is a lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore components have not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainty surrounding environmental risks is another critical issue. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is therefore requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 97E29207

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a detailed examination of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural heritage, the proposed development raises critical issues regarding its alignment with statutory obligations, national policy, and the fundamental principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful determination. There is a notable absence of essential environmental data, and the baseline information provided is both limited and inconsistent. Several key elements of the proposal remain undefined. Furthermore, the adoption of a flexible design framework obstructs a clear comprehension of the likely significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are pronounced and substantive conflicts with 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 habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, address climate considerations, and uphold environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shore, raises substantial concerns about landscape capacity, visual impact, and broader environmental consequences. Collectively, the lack of sufficient information, the reliance on undefined mitigation strategies, the evidential inadequacies, and the clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. Under 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.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal presents significant flaws, including internal inconsistencies and evidence gaps that undermine its conclusions. The application is situated within key foraging areas and migratory pathways on the west coast of the Isle

of Lewis, an area known to support internationally important seabird populations that are already in decline. However, it fails to convincingly demonstrate that these species will remain unaffected.

There exists a fundamental contradiction within the application. The developer asserts that there are 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 doubts about the reliability of the assessment, suggesting that its conclusions are not backed by the evidence presented.

The assessment does not adequately address the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical importance of these feeding grounds is underappreciated, and reliance on modelling approaches introduces uncertainty, especially for species like Kittiwakes and Fulmars that are experiencing severe decline. The methodologies employed are likely to underestimate mortality, particularly when baseline data is lacking and species behaviour is not fully understood.

The proposed siting of turbines within a recognised migratory corridor creates a significant risk, forming a barrier along a primary flight path used by birds travelling between the United Kingdom and Iceland. The application lacks a thorough assessment of the long-term effects of ongoing mortality in this corridor, as well as the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the proposal does not satisfy the evidential standard required to demonstrate that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling shortcomings, means that the necessary standard of certainty has not been achieved. This situation activates the precautionary principle and renders a lawful conclusion in favour of consent impossible.

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

In summary, the assessment is deemed unreliable due to its inconsistencies, methodological flaws, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements essential for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. The application adopts a narrow view, treating heritage as separate, static entities, rather

than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet are classified merely as static features in the assessment. This classification neglects their current use, meaning, and the implications of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their vital role in community life.

Additionally, the assessment does not adequately address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These factors are crucial to the area's identity but have been entirely disregarded, resulting in a significant oversight. Without considering these elements, the cultural ramifications of the proposed development cannot be comprehensively understood.

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

A serious procedural lapse is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

Overall, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not provide a solid foundation for evaluating the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical issue, as the full report commissioned by the developer remains unpublished. This absence of

information creates a significant evidential gap, which hinders both public understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research. Available summaries reveal that local residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are not merely speculative; nonetheless, without access to the complete assessment, proper scrutiny of these findings is not possible, limiting the ability to ascertain their significance in the decision-making process.

Furthermore, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with findings from the developer acknowledging "cultural loss." Despite these concerns, such impacts have not been adequately incorporated into the main application or appropriately considered. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is essential for developments of this magnitude, especially when community character and functioning may be at stake. The incomplete dataset provided by the application fails to establish a proper evidential foundation for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm; however, the evidence available suggests the existence of adverse effects that have not been fully disclosed. Consequently, without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications of this situation are considerable. The competent authority cannot 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 satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal poses significant concerns regarding the interconnected relationship between seascape, landscape, and cultural heritage. Key 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

heritage assets as isolated, neglecting their interdependence and failing to evaluate the impacts on their setting and cultural significance adequately. The industrialisation of the seascape threatens to sever these connections, altering the context in which these heritage assets are experienced and disrupting their relationship with the natural horizon. This signifies a broader cultural and spatial harm that has not been sufficiently addressed in the application.

The visual impacts identified are particularly concerning. The application does not accurately represent the magnitude of visual change resulting from the introduction of large-scale turbines. Their scale and proximity would dominate views from residential areas, historic sites, and popular coastal locations, leading to a direct loss of visual amenity. The assessment inadequately conveys the significance of this impact within such a sensitive landscape, undermining the appreciation of naturalness and remoteness which defines the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not comprehensively reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings introduce a risk that the visual impact has been understated, casting doubt on the reliability of the assessment's findings.

From a policy standpoint, the proposal is incompatible with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of proposed changes conflicts with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the absence of a robust worst-case assessment further weakens any assertions of compliance with relevant policies.

The overall assessment fails to accurately depict 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 not aligned with the protection of this landscape. 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, leading to a permanent transformation rather than one that could be reduced to an acceptable level through mitigation efforts.

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 a vibrant marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life provided in the application is inadequate, failing to deliver a comprehensive evaluation of ecological and socio-economic impacts. The application lacks evidence that fishing activities can be displaced without significant consequences, raising concerns about the potential for overfishing in alternative locations. This oversight is critical, as the absence of alternative fishing grounds that are accessible and capable of supporting

increased pressure risks economic repercussions for the local fishing fleet.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended timeframe is likely to disturb marine life over large distances, specifically affecting species such as dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population is concerning, yet the application appears to downplay the significance of these potential impacts without adequate supporting evidence.

An inconsistency within the application arises from the acknowledgement of the need for licences to permit harm to European Protected Species while simultaneously stating that the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The incomplete assessment of onshore infrastructure fails to account for the full range of impacts associated with this single integrated project. The intrinsic linkage between the offshore turbines and onshore works results in an assessment that is fragmented, thereby obscuring the true scale of environmental and socio-economic effects.

The elements related to onshore development encompass cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the required access infrastructure through sensitive landscapes. Such works necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is notable for being a significant carbon store and an ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, which inhibits a thorough understanding of the overall environmental footprint of the project.

Furthermore, by omitting or postponing the evaluation of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be examined collectively; however, the distinct treatment of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are subject to protective policies. The application does not substantiate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been implemented, leading to an evidential gap regarding biodiversity protection.

Additionally, concerns arise related to carbon balance, as the disturbance of peatland releases stored carbon and may create a carbon debt, which contradicts the objectives of renewable energy development. The application fails to adequately address this matter or to demonstrate that the overall carbon balance remains favourable.

The routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or processes have been commenced, raising questions about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife represents a significant failure within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism, particularly in emerging sectors like astro-tourism. The proposal suggests the introduction of permanent red aviation lighting that will be visible over extensive distances, creating a continuous and disruptive "wall of light" effect across the western horizon, which would drastically change the night-time environment.

Furthermore, the application lacks an evaluation of the impact that this lighting will have on visual amenity, landscape character, and the experiences of both residents

and visitors. This gap is critical, considering the vital role dark skies play in the region's identity. The failure to assess these implications leads to an incomplete landscape and environmental evaluation.

More alarmingly, the proposal does not address the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting, which can cause disorientation and a higher risk of collisions. Without a lighting impact assessment or phototaxis study, there is no analysis regarding how the introduction of aviation lighting may affect these birds or increase their mortality rates.

This gap in assessment is further exacerbated by the reliance on daytime survey data within the ornithological evaluation, which does not account for nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The lack of site-specific night-time data constitutes a critical shortcoming in understanding the ecological impacts.

In the absence of an assessment focused on nocturnal effects, it is impossible to ascertain whether protected species or designated sites will face adverse impacts. The necessary evidential standard to exclude potential adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, this oversight contradicts National Planning Framework 4, particularly regarding the safeguarding of natural areas and environmental quality. Additionally, it compromises the wider evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the principles of sustainable development as outlined by statutory duties and national policy. This application mirrors the key concerns 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 put forward under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for this application is notably absent. There are serious deficiencies in baseline data, the use of an undefined design envelope, unspecified mitigation measures, and the exclusion of critical impact pathways. These include

nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a full understanding of potential significant effects or residual impacts.

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

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, fails to demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The overall assessment of cumulative impacts from both offshore and onshore elements is insufficient, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit inconsistencies. The requisite evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

The proposed development would lead to considerable 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 adverse effects on tourism constitute permanent impacts that cannot be mitigated to an acceptable degree.

In light of these factors, the application is fundamentally and procedurally unsuitable for determination. The vast information gaps, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should therefore refuse consent on these bases or invoke relevant regulatory provisions to necessitate the submission of the missing information.

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

Additional Comments

The development is totally out of proportion to the location. The community do not want this enormous and damaging development to go ahead and would have no problem with a smaller scale, community owned wind farm which would bring genuine benefits to the community and environment. This development is pure 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: 5314794C

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

Dear Sir/Madam

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

Critical environmental data is notably absent, and there is a lack of adequate baseline information, which is both limited and inconsistent. Key aspects of the proposal remain undefined, compounded by the use of a flexible design framework that hinders a clear understanding of the likely significant effects. The reliance on unspecified mitigation measures casts doubt on their potential effectiveness, leaving the documentation insufficient to provide a comprehensive understanding of the environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

There are significant policy conflicts associated with this application. 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 proposal fails to demonstrate adherence to national requirements for protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for granting consent and impede the competent authority's ability to deem the development acceptable in policy terms.

Furthermore, the unprecedented scale of the proposal raises alarming concerns regarding landscape capacity, visual dominance, and environmental impact, given the positioning of large turbines in close proximity to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance suggests that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, presenting an incomplete and unreliable picture of the ecological receptors in the West Lewis coastal environment. This marine system is biologically active and

highly sensitive, yet the baseline data is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment falls short in providing a solid evidential basis for understanding potential impacts.

Among the most critical oversights is the failure to properly evaluate otters, which are a European Protected Species. The application neglects to acknowledge and assess their use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the assessment cannot accurately determine the potential impacts of construction activities, noise, and increased human presence. This absence of analysis undermines the conclusions drawn regarding the significance of effects on this species.

The evaluation of basking sharks also suffers from serious deficiencies. Relying solely on aerial surveys introduces considerable bias in detection, particularly under Atlantic conditions, which may lead to an underestimation of their presence. In contrast, established land-based observations reveal a frequent use of these waters. The failure to incorporate such critical data results in an incomplete understanding of the baseline and diminishes the reliability of the conclusions.

These methodological flaws mean that the assertions of negligible or non-significant effects are largely based on assumptions instead of solid evidence. The lack of adequate baseline data further complicates the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risks to marine species and habitats.

Regulatory requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4 have not been met, as the application fails to identify or assess protected species properly. The resulting uncertainty makes it impossible to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate to the required evidential standard that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely

affected. Key foraging areas and migratory pathways are located within the project area, yet the assessment does not thoroughly evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a contradiction in the application, as the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment lacks sufficient proof that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. It inadequately accounts for the significance of these feeding grounds, relying on modelling methods that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor creates an additional and significant risk, functioning as a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application fails to adequately consider the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These deficiencies hinder a comprehensive evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage along the West Lewis coastline is insufficient. It does not recognise this area as a living cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the application treats heritage as a collection of static assets, overlooking their social, cultural, and spiritual roles in the community.

Significant shortcomings are evident in the treatment of important sites such as the

cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places of spiritual significance. However, the assessment mischaracterises them as unchanging features, neglecting their ongoing use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural impacts, ignoring their vital place in community life.

Moreover, the assessment does not address intangible cultural heritage, such as the Gaelic language and local traditions, which are essential to the area's identity. The lack of consideration for these elements represents a major gap in the assessment, making it impossible to fully grasp the cultural impact of the proposed development.

Concerns also arise regarding community rights and participation. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples. Despite this, the process of Free, Prior and Informed Consent has not been carried out. This lack of engagement undermines the assessment's validity and does not align with principles of participation concerning cultural and environmental matters.

Additionally, a significant procedural error is the absence of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot adequately assess the social, cultural, and economic effects on the island community. This oversight alone renders the determination unlawful.

From a policy standpoint, these inadequacies contradict National Planning Framework 4, especially regarding the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from required policies.

Overall, the lack of consideration for living heritage, intangible cultural significance, community rights, and statutory responsibilities leads to a critical evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, failing to provide a reliable basis for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. This proposal would create a continuous industrial presence that fundamentally alters the existing character and results in a permanent transformation of the landscape. The application inadequately represents the magnitude of visual change, as the scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Such a significant alteration would adversely affect visual amenity and erode the qualities of naturalness and remoteness, yet the assessment does not properly convey the level of impact or its importance within this sensitive landscape.

Furthermore, there are methodological issues regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns that the extent of visual impact may have been understated, compromising the reliability of the assessment.

The assessment also fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. By treating these heritage assets as isolated entities, the assessment overlooks their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these relationships, altering the way in which heritage assets are experienced and disrupting their connection to the natural horizon. This not only results in visual impact but also encompasses a wider cultural and spatial harm that has not been sufficiently assessed within the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural spaces and historic assets. The scale of change proposed is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertions of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the anticipated changes are fundamental and permanent, rather than amenable to reduction through mitigation efforts.

Overall, 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 reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This dependence on vague future strategies is particularly alarming given the sensitivity

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

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

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

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not adequately address the ecological and socio-economic impacts on these vital resources. It lacks a robust evaluation and fails to demonstrate how the fishing activity and habitats can be preserved without significant disruption.

A critical concern is the assumption that fishing can be displaced without negative consequences. The application offers no evidence that alternative fishing grounds are available or capable of absorbing the additional pressure from displaced activities. This is a serious oversight, as displacement could lead to overfishing in other areas and adversely affect the local fishing fleet's economic stability. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling expected over an extended period is likely to disturb marine life across considerable distances, potentially impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without providing sufficient evidence.

There is a notable inconsistency within the application regarding the need for licences for harm to European Protected Species while simultaneously asserting that the impacts are negligible. This contradiction raises significant questions about the credibility of the assessment and compliance with the Habitats Regulations, especially where harm necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without an exhaustive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be fully understood.

From a policy standpoint, the application fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus precluding any assertion that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not consider the full extent of impacts from what is a single integrated project. The offshore turbines and onshore works are linked and should be assessed together; however, they are currently evaluated separately, which obscures the true scale of environmental and socio-economic effects.

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

By omitting or postponing the assessment of onshore impacts, the application prevents

a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered together. The current separation of the offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not adequately understood.

Furthermore, there are significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not demonstrate that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This results in a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding carbon balance; the disturbance of 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 issue or show that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land may create conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been initiated, casting doubt on its deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project comprehensively and demonstrate the protection of peatlands, habitats, and land use interests contradicts 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 comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant shortcoming in the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that will be visible over extensive distances, creating a continuous "wall of light" effect across the western horizon. This alteration will fundamentally disrupt the night-time environment.

Furthermore, the application does not evaluate how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly concerning given the crucial role that dark skies play in the area's identity and in burgeoning sectors like astro-tourism. The failure to consider these impacts leaves a notable gap in the landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, leading to disorientation and a higher risk of collision. The application lacks any lighting impact assessment or phototaxis study, resulting in an oversight of how the proposed aviation lighting may affect these species and potentially increase mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which fails to capture the nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, also face the threat of disorientation from artificial lighting, yet this has not been properly assessed. The absence of site-specific night-time data creates a critical void in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may suffer adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and obstructing a lawful determination.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises serious concerns regarding its compliance with sustainable development principles when evaluated against statutory obligations, national policy, and evidential requirements. It mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these critical issues.

There are significant shortcomings in the evidential basis for the application. It lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Key impact pathways, particularly regarding nocturnal wildlife, the entirety of onshore infrastructure, and tourism effects, have been overlooked. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of the likely significant effects or residual impacts.

Furthermore, there are evident procedural deficiencies. The absence of a compliant Island Communities Impact Assessment contravenes the statutory duties outlined in the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a material oversight. 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 stands in direct contradiction to National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural habitats, or cultural heritage. Additionally, it fails to illustrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of offshore and onshore elements have not been adequately assessed, clouding the understanding of 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, in certain instances, inconsistent. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and barring a lawful conclusion on the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: F61A2689

