

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and accompanying documents reveals numerous material deficiencies across planning, environmental, cultural, and procedural areas. This development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline and rich cultural identity. The proposal's scale, design, and proximity to the shoreline pose significant compatibility concerns with existing statutory requirements, national policy, and sustainable development principles.

The application is severely lacking an adequate evidential basis necessary for lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many aspects of the proposal remain undefined, complicating the assessment of likely significant effects. The reliance on an unspecified flexible design framework, along with unarticulated mitigation measures, means that the effectiveness of these measures cannot be adequately assessed. Consequently, the documents fail to facilitate a full understanding of potential environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsubstantiated by robust evidence.

There are substantial conflicts with established policy. The proposal demonstrates inconsistency with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, and overall health and wellbeing. It does not satisfactorily show that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These issues fundamentally challenge the statutory tests necessary for consent and hinder the competent authority's capacity to determine the development's acceptability in policy terms.

The scale of this proposal is unprecedented for this location, with large turbines situated near the shoreline, raising serious concerns related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the application must adhere to the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

There are also substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to offer a thorough and

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

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that compromise its reliability. The development is situated within key foraging areas and migratory pathways on the

west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already declining. However, the application fails to prove to the necessary evidential standard that these species will not suffer adverse effects.

There are contradictions within the application itself. The developer claims that there will be no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and highlights that the conclusions drawn are not backed by adequate evidence.

The assessment lacks sufficient evidence regarding the seabirds connected to protected sites such as the Lewis Peatlands and St Kilda. It does not fully account for the significance of these feeding grounds and relies heavily on modelling approaches that introduce uncertainty, particularly for species facing severe declines like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially since the baseline data is incomplete and the behavioural responses of these species are not thoroughly understood.

The placement of turbines within a recognized migratory corridor adds a significant risk, creating a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential impact on species with limited global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to affirm that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, combined 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, thereby hindering a lawful conclusion in favour of consent.

Moreover, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of evidence. These issues impede a thorough evaluation of impacts and substantiate the conclusion that the application does not 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 the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, static entities instead of acknowledging their

continuous social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the handling of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment categorises them as static features, neglecting their ongoing significance and the repercussions of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment neglects to evaluate intangible cultural heritage, such as the Gaelic language, traditions, and the enduring connection between the community and its coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, representing a major gap. Without addressing these elements, the potential cultural impact of the proposed development cannot be fully comprehended.

There are also pressing issues surrounding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, but there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to align with established principles of participation concerning decisions that affect cultural and environmental interests.

A crucial procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This oversight alone hinders a lawful determination.

From a policy standpoint, these shortcomings put the proposal at odds with National Planning Framework 4, especially regarding the protection of historical assets and places. The inability to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear deviation from policy obligations.

When taken as a whole, the neglect to assess living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential void. The cultural impacts of the proposed development remain unassessed, and the application fails to offer a sufficient foundation for determining the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of health, wellbeing, and social impacts associated with the development is fundamentally flawed and lacks the necessary transparency for a lawful appraisal. Although the developer commissioned a Social Impact Assessment, which included engagement with local residents, the complete report remains unpublished. This creates a significant evidential gap, hindering both public

understanding and the competent authority's ability to assess the full range of social risks highlighted in the developer's research.

Summaries available suggest that residents are currently facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed project. These impacts stem from direct interactions and are therefore based on actual experiences, rather than assumptions. However, the absence of the full assessment limits the scrutiny of these findings and restricts the capacity to evaluate their significance in the decision-making process.

Furthermore, there is substantial evidence indicating that the proposal is seen as a direct threat to community identity and cohesion, with findings from the developer highlighting "cultural loss." Despite this acknowledgment, the impacts have not been adequately incorporated into the primary application or assigned appropriate importance. The failure to disclose the entire Social Impact Assessment clouds the true human and social costs associated with the development.

This lack of transparency further compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for projects of this magnitude, especially when community dynamics may be influenced. By withholding the complete dataset, the application does not offer a comprehensive evidential foundation for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development projects should promote positive health outcomes and mitigate harm, yet the existing evidence reveals adverse effects that remain undisclosed. Without the full assessment, it is impossible to establish compliance with this policy.

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

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This deficiency precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking and does not reflect the sensitivity of the environment or the scale of change adequately. The West Lewis coastline, characterised by an open Atlantic horizon and an undeveloped character, offers a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create an overwhelming industrial presence

that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately represent the extent of visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct impact on visual amenity, eroding the essential qualities of naturalness and remoteness. The assessment does not properly convey the significance of this impact, especially within such a sensitive landscape.

Concerns arise over the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to significant cultural heritage sites and valuable landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, which undermines the reliability of the assessment.

Moreover, the application fails to evaluate the interconnected relationship between landscape, seascape, and cultural heritage effectively. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets, neglecting their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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 extent of change proposed is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The lack of a robust worst-case assessment further undermines the claim of compliance with policy.

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

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 deficiencies hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with this proposal is insufficient and lacks the necessary detail to properly evaluate the potential environmental impacts. The project entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed after consent has been granted, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on vague future measures is especially troubling given the fragile nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats that are susceptible to disruption from sediment and contamination. While the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it falls short in providing adequate details on how these incidents will be prevented, managed, or monitored.

Additionally, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and clearly articulated management strategies, it remains impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the effects on marine species and habitats, which have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application does not allow for the evaluation of whether adequate safeguards are in place to respond to pollution incidents. This introduces a procedural risk and compromises the ability of the competent authority to properly assess environmental protection measures before making a determination.

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

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of fisheries and marine life, which is critical given the rich marine ecosystem and vibrant fishing

industry off the West Lewis coast. It fails to adequately protect or maintain these vital habitats while raising concerns about socio-economic impacts. A fundamental flaw lies in the assumption that fishing activities can be easily displaced. The application lacks evidence to show that alternative fishing grounds are both available and capable of accommodating the additional pressure, which poses a risk of overfishing elsewhere and could have detrimental effects on local livelihoods.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated from construction activities. The anticipated long-duration hammer piling is expected to disturb marine life over large distances, notably impacting the local bottlenose dolphin population. The application seems to minimise the importance of these disturbances, offering insufficient evidence to support its claims.

In a troubling contradiction, the application acknowledges the necessity for licences to allow for potential harm to European Protected Species while simultaneously describing the anticipated impacts as negligible. This inconsistency casts doubt on the assessment's credibility and raises alarms regarding compliance with the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Additionally, the assessment does not account for the cumulative impacts from various pressures such as habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined factors, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

From a policy standpoint, the proposal does not align with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity. This lack of clarity prevents any determination that the project constitutes sustainable development.

In summary, the deficiencies in the assessment regarding fishing displacement, underappreciation of acoustic impacts, and internal contradictions render the evaluation incomplete and unreliable, hindering a thorough understanding of the potential repercussions on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of onshore infrastructure, which is a crucial element of what constitutes a single integrated project. The offshore turbines and onshore works are inherently connected, yet their assessment is conducted separately. This fragmented approach obscures the true scale of both environmental and socio-economic impacts.

The onshore components encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access

infrastructure through sensitive landscapes. Excavation activities will take place across areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The current application does not adequately assess these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring or excluding an assessment of onshore impacts, the application undermines the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered collectively. However, the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. Disturbances to peatland release stored carbon, potentially creating a carbon debt that runs counter to the aims of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance remains advantageous.

Furthermore, 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 raises serious questions about the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This significant alteration of the night-time environment threatens the exceptionally dark skies of the West Lewis coastline, which are essential to the area's environmental quality, cultural identity, and tourism value. The application fails to assess the impacts of this lighting on visual amenity, landscape character, and the

experience of residents and visitors, despite the crucial role dark skies play in the region's identity and in emerging sectors such as astro-tourism.

Moreover, there is a complete lack of evaluation regarding the impact on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and elevate collision risks. The absence of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting may affect these species or contribute to increased mortality rates. This gap is further compounded by the reliance on daytime survey data in the ornithological assessment, which neglects to capture nocturnal activity or the associated risks. Vulnerable species, such as Kittiwakes, which forage or migrate at night, remain unassessed in terms of their risk of disorientation from artificial lighting.

Without a comprehensive assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The failure to meet the evidential standard required to exclude adverse effects beyond reasonable scientific doubt invokes the precautionary principle, thereby precluding a lawful determination. Additionally, from a policy standpoint, this omission contradicts National Planning Framework 4, which emphasises the protection of natural places and environmental quality. It also undermines the thorough assessment of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In conclusion, the lack of assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that caused the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable in terms of the scale of industrialisation. This current application is presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

The application lacks a complete and reliable evidential basis for decision-making. There are significant gaps in baseline data, it utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it fails to address key impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. As a result, the Environmental Impact Assessment is incomplete, inhibiting a full understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018.

Additionally, not disclosing the full Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impacts of offshore and onshore elements have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain unclear and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle, preventing a lawful conclusion that the impacts are acceptable.

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

In summary, 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. The competent authority should refuse consent on these grounds or invoke relevant regulatory provisions to require the submission of the missing information.

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

Additional Comments

I moved to Lewis to start a family and enjoy the safe nature rich un polluted environment. I am encouraging others to do the same. I will leave immediately if this goes ahead. The stress this is causing me is effecting my health.

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: 0BDA53D3

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. The application is submitted under the marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and related documents has revealed significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The wind farm is proposed to be located off the west side of the Isle of Lewis, which is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

Concerns arise regarding the application's compliance with statutory requirements, national policy, and sustainable development principles. It lacks an adequate evidential basis for a lawful determination. There are critical environmental data gaps, with baseline information being both limited and inconsistent. Additionally, key aspects of the proposal are not clearly defined. The flexible design framework used complicates the assessment of likely significant effects, and the proposed mitigation measures have not yet been specified, making it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible effects lack robust evidence.

There are notable conflicts with policy. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests required for consent and hinder the competent authority's ability to determine that the development is acceptable from a policy perspective.

The scale of this proposal is unprecedented for the area. The large turbines are planned to be positioned close to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental impact. In summary, the lack of sufficient information, dependence on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unsuitable for a lawful determination. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary transparency and reliability, failing to provide a comprehensive account of the anticipated environmental

effects of the proposal. The flexible Project Design Envelope approach, which does not commit to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This uncertainty undermines the integrity of the assessment, meaning that the impacts outlined may not accurately represent the final development, thus preventing both the public and the competent authority from fully understanding the true extent of environmental effects.

The application depends substantially 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 hinders any meaningful evaluation of their effectiveness or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly established before any determination is made.

Furthermore, there are serious evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and robust assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is fundamentally lacking and fails to fulfil the statutory obligations of the Environmental Impact Assessment regime. Rather than delivering a structured and reasoned comparison of viable alternatives with respect to their environmental impacts, the application merely recounts the evolution of the project. This narrative fails to convincingly show that less harmful options have been identified, assessed, and selected over more damaging ones.

There is a notable absence of a transparent and evidence-based comparison of various offshore locations, development scales, or design configurations. The application does not adequately illustrate that the developer has given serious consideration to positioning the turbines further offshore, a move that would likely mitigate visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining impact, the lack of such analysis undermines any assertion that the proposed siting is the least damaging option available.

These deficiencies are also evident in the assessment of cable routing and landfall, where insufficient evidence is provided to indicate that alternative routes have been thoroughly explored to avoid or reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been effectively implemented, instead leading to an over-reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful consideration of site selection, layout, and infrastructure routing. This shortcoming reflects a failure to adhere to the established mitigation hierarchy, which hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. The absence of a rigorous alternatives assessment raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant flaw that leads to the overarching conclusion that the application has not been sufficiently evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The 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 assessment of the proposed development is significantly flawed, presenting major evidence gaps and internal contradictions that cast doubt on its conclusions. The development is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. However, the application fails to demonstrate convincingly that these species will not be adversely affected.

There is a fundamental inconsistency in the application where the developer asserts that there are no significant adverse effects while simultaneously making a case for Habitats Regulations derogation, which is only warranted when significant harm is anticipated. This contradiction raises questions about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided.

The assessment does not adequately prove that seabirds associated with protected

areas, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds has not been thoroughly acknowledged, and the reliance on modelling methods introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The proposed siting of turbines within a recognised migratory corridor poses an additional and serious risk, creating a barrier within 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 sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

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

Furthermore, the identified deficiencies represent a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse impacts places the proposal in direct conflict with national policy.

In summary, the assessment's unreliability stems from internal inconsistencies, methodological flaws, and inadequate evidence. These shortcomings hinder a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is significantly flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The application approaches heritage in a limited manner, viewing it merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

Moreover, the application does not take into account the intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are essential to the area's identity but are wholly omitted from the assessment, which is a critical gap. Without addressing these factors, the cultural implications of the development cannot be fully grasped.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking community has a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a significant procedural flaw in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the process unlawful.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, constitutes a clear violation of policy standards.

In summary, the inadequate assessment of living heritage, intangible cultural value, community rights, and legal responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing associated with the proposal is significantly deficient and lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report has not been made publicly available. This absence represents a substantial evidential gap that inhibits both public understanding and the competent authority's ability to ascertain the full range of social risks identified in the developer's research.

Residents have expressed measurable stress, anxiety, and concern stemming from the scale and proximity of the proposed development, as evidenced by direct engagement with the community. However, the lack of access to the full assessment hampers proper scrutiny of these findings, limiting the capacity to evaluate their significance in the decision-making process. Furthermore, the proposal is perceived as a threat to

community identity and cohesion, with the developer's findings highlighting a potential "cultural loss." Notably, these impacts have not been adequately addressed within the main application, nor have they been assigned appropriate weight, thereby obscuring the genuine human and social costs associated with the development.

The absence of transparency fundamentally undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functionality may be jeopardised. By failing to provide the complete dataset, the application lacks a thorough evidential basis necessary for weighing the benefits against the potential harms.

From a policy standpoint, the application falls short of demonstrating adherence to the National Planning Framework 4 concerning health and wellbeing. Development must not only support positive health outcomes but also mitigate harm. The evidence currently available indicates existing adverse effects that have not been fully disclosed, rendering it impossible to demonstrate compliance with this policy without the full assessment.

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, in conjunction with the evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This deficiency obstructs a lawful determination and underscores the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking and does not adequately account for the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

This application fails to accurately convey the magnitude of the visual change that would ensue. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the intrinsic qualities of naturalness and remoteness. There is a notable shortcoming in how this impact is presented, failing to reflect its significance within such a sensitive landscape.

There are also serious methodological issues concerning the chosen visual viewpoints. Evidence indicates that these viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact may have been understated, compromising the reliability of the assessment.

Additionally, the assessment does not adequately consider the interconnected nature of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected visually and spatially to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of impacts on their context and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the safeguarding of natural landscapes and historic assets. The level of change proposed is inconsistent with the imperative to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy guidelines.

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

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

CONSTRUCTION AND POLLUTION RISKS

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

adequacy or effectiveness.

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

The absence of detailed emergency response procedures compounds these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures effectively at the point of determination. From a regulatory perspective, the deferral of critical environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed prior to consent, and in the absence of this information, a lawful determination cannot be made. The application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The extensive use of high-energy hammer piling is likely to create disturbances over vast distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate supporting evidence.

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

Moreover, the assessment does not address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and fishing activity displacement. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a materially incomplete assessment of onshore infrastructure, failing to fully account for the impacts of what constitutes a single integrated project. The offshore turbines are linked with the onshore works, yet these components are evaluated separately, leading to a fragmented approach that obscures the actual extent of environmental and socio-economic effects.

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

By excluding or deferring the assessment of onshore impacts, the application fails to

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that contribute significantly to environmental quality, cultural identity, and tourism value.

Critically, the Environmental Impact Assessment lacks an evaluation of how this lighting may affect visual amenity, landscape character, and the experiences of both residents and visitors. Such an omission is concerning, especially as dark skies play a vital role in the area’s identity and in emerging sectors like astro-tourism. The absence of this assessment results in a noticeable gap in understanding the overall landscape

and environmental impacts of the proposal.

Moreover, there is no consideration of the effects of artificial lighting on nocturnal wildlife. Species including the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly vulnerable to disorientation due to phototaxis, which can lead to increased collision risks. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to assess potential effects on these species or the possibility of increased mortality.

The inadequacy of relying solely on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, the omission of these assessments is in conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is an integral aspect of the overall ecosystem.

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

TOURISM

The application presents a significant deficiency in its assessment of tourism impacts, neglecting to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution from tourism.

Tourism has experienced substantial growth, increasing 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. Nevertheless, the application fails to model how the potential industrialisation of the seascape and deterioration of environmental quality could

affect Tourism Gross Value Added or the broader economic resilience of the region. In the absence of such analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the evaluation overlooks the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been appraised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with the National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector, and it does not furnish adequate evidence to enable the competent authority to evaluate the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors that drive visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This limitation undermines the capacity for a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, which highlighted unacceptable levels of industrialisation. This new application is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short of these crucial criteria.

There are critical deficiencies in the evidential basis necessary for a thorough evaluation. The application lacks comprehensive baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and overlooks significant impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. The Environmental Impact Assessment is therefore inadequate, inhibiting a complete understanding of potential significant effects or residual impacts.

Furthermore, clear procedural failings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligation under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural environments, or cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring impacts 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, in some instances, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and obstructing any lawful conclusion that impacts are acceptable.

The proposal would also 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 connections, and adverse effects on tourism are permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is procedurally and substantively unfit for determination. The significant information deficiencies, combined with conflicts with policy and unresolved environmental risks, prevent a lawful, evidence-based decision. The competent authority must either reject the consent application on these grounds or utilise the relevant regulatory provisions to request the missing information.

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

Additional Comments

As a teenager growing up in the Hebrides and working in the west side, I believe the integration of the wind farm off the coast would be a disgrace and an eye sore to our island. The impact would be devastating. Leaving a visual and physical impact on residents of the island, leaving people losing sleep and affecting activities such as surfing and fishing and therefore destroying parts of our Island culture. It would also have a huge impact on our local wildlife and seaside, leaving fish poisoned and force them away from their natural habitats.

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: DA10EE13

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

Dear Sir/Madam

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to address the cultural heritage and community identity of the West Lewis coastline, which is a dynamic cultural landscape interwoven with environment, language, tradition, and community. It adopts a narrow perspective, viewing heritage merely as disconnected, unchanging assets rather than recognising their vital ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are not accurately represented in the assessment. These locations are active burial sites and centres of spiritual practice; however, they are wrongly categorised as static features. This mischaracterisation ignores their continued significance, the impact of development on their settings, and leads to an inadequate evaluation of the cultural implications.

Moreover, the assessment neglects intangible aspects of cultural heritage, including the Gaelic language, traditional practices, and the deep-rooted relationship between the community and its coastal environment. These elements are crucial to the area's identity, yet they are entirely omitted from the assessment, which represents a serious oversight. Without these considerations, the true cultural impact of the development remains unexamined.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community, recognised as Indigenous People, has not been afforded Free, Prior and Informed Consent in this process. The lack of meaningful engagement calls into question the validity of the assessment and disregards essential principles of participation in matters affecting cultural and environmental interests.

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

From a policy standpoint, these deficiencies directly contradict National Planning Framework 4, especially regarding the preservation of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, illustrates a significant departure from established policy requirements.

In summary, the inadequate assessment of living heritage, intangible cultural values, community rights, and compliance with statutory obligations leads to a substantial evidential gap. The application does not sufficiently evaluate the cultural impacts of the development, thus failing to provide a clear understanding of its true cultural costs.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment has not been fully published, resulting in a significant evidential gap. This lack of transparency limits both public understanding and the competent authority's ability to evaluate social risks identified in the developer's own research. While available summaries indicate that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, the absence of the complete assessment hinders proper scrutiny of these findings and restricts the decision-making process regarding their

significance.

Moreover, the perception of the proposal as a threat to community identity and cohesion has been noted, with "cultural loss" highlighted in the developer's findings. However, these impacts have not been adequately incorporated into the main application or assigned the necessary weight. The non-disclosure of the full Social Impact Assessment therefore obscures the actual human and social costs of the development.

This opacity also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning are at stake. Without the complete dataset, the application lacks a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the evidence available points to adverse effects that remain undisclosed. Consequently, the absence of the full assessment precludes any demonstration of compliance with this policy.

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

In summary, the failure to disclose the full Social Impact Assessment, coupled with the documented existing adverse impacts, renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and substantiates the conclusion that the application is not backed by sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is significantly lacking in detail, which hinders the ability to evaluate the likely environmental impacts. The project entails substantial seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be devised after consent has been granted, making it impossible to adequately assess their effectiveness or sufficiency.

This reliance on vague future measures is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk of sediment disturbance and

contamination. The application does acknowledge various risks, including sediment mobilisation and the potential for accidental chemical or oil spills, yet it fails to outline sufficient strategies for prevention, control, or monitoring of these risks.

Moreover, there is uncertainty concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The lack of robust modelling and well-defined management strategies means that 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 identified as sensitive within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application does not allow for an evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated before consent is granted. When this information is missing, a lawful determination cannot be made. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts results in a materially deficient assessment. These shortcomings obstruct a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with the project is fundamentally flawed, failing to address the comprehensive impacts stemming from what constitutes a single integrated development. The offshore turbines and the onshore works are interconnected, yet they are evaluated in isolation, leading to a fragmented assessment that obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the cabling that traverses protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through ecologically sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon reservoir and ecologically sensitive habitat. The application does not present a thorough evaluation of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The application also neglects to assess onshore impacts adequately, which prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates a holistic consideration of all project components; however, the disjointed treatment of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Significant risks to sensitive habitats, such as machair systems and peatland environments that are subject to policy protection, are also present. The application fails to demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, creating a notable evidential gap regarding biodiversity protection.

Moreover, concerns arise regarding carbon balance due to the disturbance of peatland, which can release stored carbon and potentially create a carbon debt, undermining the objectives of renewable energy development. The application does not sufficiently address this issue or prove that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or procedures have been initiated, leading to questions about the project's deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation regarding nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. No assessment has been made concerning the impacts of artificial lighting on species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to light. These species can experience disorientation due to phototaxis, leading to an increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, which means it fails to consider how the proposed aviation lighting could affect these species or potentially increase mortality rates.

Moreover, the assessment relies on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are similarly vulnerable to the effects of artificial lighting. This oversight creates a

critical gap in understanding the ecological impacts that the proposal may have on local wildlife.

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

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

Overall, the failure to assess the impacts on dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination. Without a thorough assessment, it is impossible to ascertain whether protected species or designated sites would be adversely affected, which engages the precautionary principle and necessitates a more cautious approach.

TOURISM

The proposed development brings serious concerns regarding its impacts on tourism, a vital component of the Isle of Lewis economy. With tourism being fundamentally reliant on the area's wild coastline, near-pristine landscape, dark skies, and the overall sense of remoteness, any industrialisation of the seascape may jeopardise this crucial sector. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the economic contribution of tourism.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application lacks a model that considers how potential degradation of environmental quality may impact Tourism Gross Value Added and the broader economic resilience of the community. Without this essential analysis, it remains unclear if the development would create a net economic benefit or threaten an established and flourishing sector.

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, such as the need for unspoiled landscapes and dark skies, which enhance the visitor experience and cater to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this issue, leaving a substantial void in understanding how the proposal

could affect this recognised and growing segment of the local economy.

In a context where economic diversification is limited for this island community, the lack of a thorough assessment of tourism impacts raises significant concerns regarding employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, contrary to the requirements of 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 obligation to prove net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic implications of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and recognising the island's economic dependencies result in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The 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. This application echoes the core concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these critical areas.

A significant concern is the incomplete and unreliable evidential basis for determination. There are notable gaps in baseline data and an undefined design envelope is employed, alongside unspecified reliance on mitigation measures. Key impact pathways, including nocturnal wildlife, onshore infrastructure, and tourism effects, have been omitted from the assessment. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of the likely significant effects and residual impacts.

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

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and the absence of tourism impact modelling prevents evidence of any net economic benefit. Additionally, the cumulative impacts of both offshore and onshore components have not been properly assessed, 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 incomplete and, in some areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

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

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: 4BDCB038

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

Dear Sir/Madam

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

The application lacks a sufficient evidential basis for a lawful determination. Critical environmental data is missing, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The adoption of a flexible design framework complicates the understanding of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. Consequently, the documentation does not provide a comprehensive or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are clear conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact, as large turbines are planned to be located in close proximity to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and insufficient for lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents serious deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hampers the application of a worst-case scenario assessment, which is essential for understanding the true environmental impacts. Consequently, both the public and the competent authority are left uninformed about the actual extent of these effects.

Furthermore, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet established. This approach seeks consent based on the notion that environmental harm will be mitigated later, thus obstructing any meaningful evaluation of the measures' effectiveness or the assessment of residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental aim of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations be clearly defined before any determination can be made.

Moreover, the report reveals significant evidential shortcomings, with evident gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies lead to uncertainty regarding the magnitude and significance of the impacts, particularly where claims of negligible or non-significant effects are presented without adequate supporting data. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that cannot satisfy statutory requirements.

As a result, the application does not meet the evidential standards required by the Habitats Regulations, which aim to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially in relation to protected species and sensitive habitats. Additionally, the proposal fails to adhere to the requirements set out in National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, as it cannot substantiate that the impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of clearly specified mitigation measures, and the noted gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These issues preclude a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. It

does not provide a structured and reasoned comparison of realistic alternatives based on environmental effects but instead offers a narrative account of project evolution. This method does not sufficiently demonstrate that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has seriously considered positioning turbines further offshore, an approach that would likely lessen visual, ecological, and coastal impacts. Considering the sensitivity of the West Lewis coastline and the significant impact of proximity to shore, the absence of such analysis prevents any conclusion that the proposed siting represents the least damaging option.

These inadequacies also extend to cable routing and landfall assessments, where there is insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis indicates that mitigation by design has not been effectively employed, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This constitutes a failure to adhere to the established mitigation hierarchy, thus hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy perspective, this inadequacy undermines adherence to 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 overall conclusion that the application has not been sufficiently evaluated 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 application raises immediate concerns due to significant gaps in evidence and inconsistencies within the ornithological assessment, which severely undermine its conclusions. It is crucial to recognise that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already facing decline. However, the application fails to provide adequate proof that these species will not suffer adverse effects. Key foraging areas and migratory pathways are located in the vicinity of the development, yet the assessment lacks a thorough evaluation of the potential implications related to displacement, collision risks, or habitat loss.

Moreover, a fundamental contradiction arises within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment and suggests that its conclusions lack sufficient backing from the evidence presented.

Additionally, the assessment does not convincingly establish that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical significance of these feeding grounds has not been fully accounted for, and the reliance on modelling approaches introduces further uncertainty, particularly concerning species like Kittiwakes and Fulmars that are already in severe decline. The methodologies utilised are likely to underestimate mortality, particularly where there is incomplete baseline data and insufficient understanding of behavioural responses.

Furthermore, the positioning of turbines within a recognised migratory corridor presents an additional and grave risk, creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The assessment fails to adequately address the long-term consequences of sustained mortality in this corridor, as well as the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to assert 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 situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

The identified deficiencies reflect a failure to comply with National Planning Framework 4, particularly regarding biodiversity protection and the safeguarding of natural assets. The lack of evidence demonstrating that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is compromised by internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of impacts and ultimately lead to the conclusion that the application does not fulfil the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy in assessing cultural heritage and community identity is deeply concerning, especially regarding the West Lewis coastline, which should be recognised as a living cultural landscape. This area embodies a profound interconnection between environment, language, tradition, and community. Instead, the application takes a simplistic approach, treating heritage as isolated, static entities rather than acknowledging their active social, cultural, and spiritual roles within the community.

There is a significant shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These locations serve as vital sites for burial and spiritual practices, yet they are misrepresented as mere static features in the assessment. This failure to recognise their ongoing significance and continued use leads to an incomplete evaluation of cultural effects, neglecting their

importance to community life.

Furthermore, the assessment disregards intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These elements are crucial to the area's identity but are completely overlooked, creating a substantial gap in understanding the cultural impact of the proposed development.

Concerns extend to community rights and engagement. The Gaelic-speaking population has a unique cultural identity, akin to that of Indigenous Peoples, yet there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and neglects established principles of participation in decisions that affect cultural and environmental interests.

There is also a critical procedural failure evident in the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community, making any determination unlawful.

From a policy standpoint, these failures put the proposal in direct contradiction with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the lack of recognition for living cultural practices, represents a clear deviation from policy requirements.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory obligations culminate in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, leaving the application without a sufficient foundation for evaluating the true cultural costs of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal raises significant concerns regarding social impacts, health, and wellbeing, as the assessment conducted appears to be materially deficient and lacks the necessary transparency for a lawful evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This absence creates a considerable evidential gap, hindering both the public and the competent authority from grasping the full extent of the social risks revealed by the developer's own research.

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are therefore based on observable realities rather than speculation. Nevertheless, the failure to disclose the

full assessment limits the opportunity for proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

Moreover, there is an indication that the proposal poses a perceived threat to community identity and cohesion, with concerns about “cultural loss” documented in the developer’s own findings. Despite this, the full extent of these impacts has not been adequately incorporated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when they may affect community character and functioning. By not providing the complete dataset, the application does not offer a comprehensive evidential basis to evaluate the balance between potential benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. The development should contribute to positive health outcomes and mitigate harm, yet the existing evidence indicates adverse effects that have not been fully disclosed. Without access to the full assessment, it is impossible to verify compliance with this policy.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not effectively depict the extent of visual change. The size and closeness of the turbines would dominate views from residential locations, historic sites, and popular coastal areas. This would adversely affect visual amenity and

diminish the naturalness and remoteness that define the region. The assessment fails to adequately communicate the level of impact or its importance within this sensitive landscape.

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

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

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

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

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

In summary, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans raises significant concerns regarding the proposal's adherence to environmental protection standards. The project entails extensive seabed preparation and installation in a challenging high-energy Atlantic environment, yet relies on unspecified mitigation and contingency measures that are to be developed after consent. This approach fundamentally undermines any meaningful evaluation of

the potential adequacy and effectiveness of these measures.

Particularly troubling is the sensitivity of the receiving environment, which includes the West Lewis coastline characterised by clean coastal waters and important habitats susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate information on how these risks will be prevented, managed, or monitored effectively.

Moreover, there exists a notable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of such impacts. This uncertainty further extends to the possible effects on marine species and habitats that are already recognised as sensitive in the broader assessment context.

The situation is exacerbated by the lack of detailed emergency response procedures. Deferring contingency planning until post-consent prevents a thorough evaluation of whether adequate safeguards are in place to manage pollution incidents effectively. This introduces procedural risks and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the delay in implementing essential environmental safeguards is inconsistent with the mandates of the Environmental Impact Assessment framework. It is imperative that significant effects and mitigation strategies are evaluated prior to granting consent; without such information, a lawful determination cannot be reached. Additionally, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

Collectively, the failure to articulate defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical concern is the assumption made within the application regarding the displacement of fishing activity, which is presented as a feasible option without

acknowledging potential consequences. There is no evidence provided to support the availability, accessibility, or capacity of alternative fishing grounds to accommodate any increased pressure. This significant omission raises concerns about overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and the livelihoods they support remain poorly understood.

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

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

Additionally, the assessment neglects to consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project is fundamentally flawed due to the incomplete assessment of onshore infrastructure, which neglects to acknowledge the full scope of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are intrinsically connected, yet they have been evaluated separately. This disjointed approach obscures the true magnitude of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation close to Stornoway, and the development of access infrastructure through sensitive landscapes. The planned excavation across areas of deep peat, particularly in Barvas Moor, poses risks to a significant carbon store and an ecologically sensitive habitat. As it stands, the application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By deferring or excluding the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all facets of a project are considered collectively. The current separation of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Furthermore, the project raises serious concerns about sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that impacts on these vital habitats have been thoroughly evaluated or that effective avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that the requisite consents or processes have been initiated, which raises significant concerns about the project's deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The assessment fails to address the impacts of dark skies and nocturnal wildlife, marking a significant omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, creates a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment.

Additionally, the application does not evaluate how this lighting might affect visual amenity, landscape character, or the experiences of both residents and visitors. The importance of dark skies to the region's identity and the emerging astro-tourism sector heightens the significance of this oversight, leading to a clear gap in the overall landscape and environmental assessment.

More importantly, there is a lack of assessment concerning the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application fails to include any lighting impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the associated risk of increased mortality.

This lack of evaluation is worsened by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or the risks that accompany it. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this has not been assessed. Consequently, the absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions contravene National Planning Framework 4 concerning the protection of natural places and environmental quality. Furthermore, they undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecology.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife constitutes a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis results in an incomplete application that cannot adequately support a lawful determination.

TOURISM

The application proposes large-scale offshore infrastructure that could significantly impact tourism on the Isle of Lewis. Tourism is a vital part of the local economy, with its growth from £65 million in 2017 to over £81.5 million today. This sector supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the assessment fails to evaluate how this industrialisation may affect visitor numbers, behaviour, or the overall economic contribution of tourism, even though 86% of visitors come for the scenery.

The application does not consider the essential role of environmental quality in

tourism. Unspoiled landscapes and dark skies enhance the visitor experience, and the absence of a Dark Skies Assessment leaves a significant gap regarding impacts on nature-based tourism and astro-tourism, which are growing markets. Without analysis of how industrialisation may affect Tourism Gross Value Added or economic resilience, it is unclear if the development would provide a net economic benefit or harm an important sector.

In an island community with limited economic diversification, neglecting the impacts on tourism raises concerns for employment, local businesses, and overall community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated in line with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not comply with National Planning Framework 4, particularly regarding economic impact and the demonstration of net benefit. It conflicts with strategic objectives that prioritise tourism growth and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposal. Collectively, the failure to quantify tourism impacts and assess environmental factors results in a significant evidential gap, making it impossible to conduct a thorough evaluation of the economic effects and concluding that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as outlined by statutory duties and national policy. It echoes the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was identified. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application lacks essential evidential support.

There are significant gaps in the baseline data provided, including the use of an undefined design envelope and unspecified mitigation measures. Key impact pathways, such as those concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, have not been adequately addressed. Consequently, the Environmental Impact Assessment falls short of providing a comprehensive understanding of the likely significant effects and residual impacts.

Procedural inadequacies are evident as well. The failure to include a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment constitutes a substantial oversight. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

In addition, the proposal contradicts National Planning Framework 4 by not

demonstrating adequate protection for biodiversity, natural places, and cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring potential consequences for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals are internally inconsistent. The required evidential standard to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and impeding a lawful conclusion regarding the acceptability of impacts.

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

In summary, this application is procedurally and substantively unfit for determination. The significant deficiencies in information, in conjunction with conflicts with policy and unresolved environmental risks, inhibit a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or utilises the relevant regulatory mechanisms to require the submission of the missing information.

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

Additional Comments

The proposed development presents an unacceptable and potentially devastating level of harm to the Isle of Lewis due to the following factors:

Visual and Cultural Degradation: The unprecedented scale (380m) and proximity (5km) would industrialise one of Scotland's last untouched horizons, destroying the "sense of place" vital to Gaelic heritage.

Environmental Risks: Construction noise and seabed disruption threaten critical marine mammal habitats and red-listed seabird populations, while night-time aviation lighting will end the area's dark-sky status.

Economic Conflict: The project jeopardises a tourism industry built on wilderness branding, and the proposed community fund fails to offset the potential loss of local livelihoods and the "industrial stress" imposed on residents.

Mental Health and Wellbeing: The loss of the natural landscape—a core component of islanders' identity—coupled with operational noise, poses a direct threat to the mental wellbeing of the local community.

Lack of Social License: With 88% of local residents in opposition, the project lacks the community mandate required for a development of this transformative magnitude.

Summary of concerns:

- * Construction Noise and Acoustic Disturbance
- * Chemical Leaching and Corrosion (Metal Accumulation)
- * Seabed Habitat Alteration and Sediment Disruption
- * Electromagnetic Field (EMF) Interference
- * Avian Collision and Migration Displacement
- * Hydrodynamic Mixing and Nutrient Stratification
- * The "Artificial Reef Effect" and Invasive Species
- * Downwind Atmospheric Turbulence

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: 275286C8

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and its supporting documentation, which reveals significant deficiencies in material 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, relatively untouched environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of the proposal raise questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application presents an inadequate evidential basis for lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and significant aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive or informed understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantial policy conflicts are evident, with the proposal appearing misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly linked to the statutory tests required for consent and compromise the ability of the competent authority to deem the development acceptable from a policy standpoint.

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

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 proposed development presents significant concerns regarding its impact on the ornithological landscape of the Isle of Lewis. The assessment provided is fundamentally flawed, exhibiting considerable gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to

internationally important seabird populations, many of which are already in decline. However, the application fails to convincingly demonstrate that these species will remain unaffected, especially given that the development is situated within key foraging areas and migratory pathways. There is insufficient evaluation of the potential implications of displacement, collision risk, and habitat loss.

A notable contradiction arises in the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only required if significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that its conclusions are not substantiated by the available evidence. The assessment does not adequately ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The critical nature of these feeding grounds has not been fully considered, and the reliance on modelling methods introduces uncertainties, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses remain inadequately understood.

Moreover, the placement of turbines within a known migratory corridor adds a significant risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of sustained mortality in this corridor and the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application does not meet the necessary evidential threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, preventing a lawful conclusion that would support consent.

The identified deficiencies also reflect non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these factors render the assessment unreliable, plagued by internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a robust evaluation of potential impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly inadequate, failing to accurately portray the degree of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The addition of large-scale turbines in close

proximity to the shore would create a persistent industrial presence, fundamentally changing this character and leading to an irreversible transformation of the landscape.

Moreover, the application does not sufficiently depict the extent of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not accurately reflect the significance of this impact within the context of such a sensitive landscape.

Concerns are also present regarding the methodology used for selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact is understated, casting doubt on the reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these as isolated assets without acknowledging their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, modifying the context in which heritage assets are perceived and severing their connection to the natural horizon. This signifies not just a visual impact, but also a wider cultural and spatial damage that has not been properly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The scale of change is incompatible with the requirement to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, thereby creating a continuous and intrusive “wall of light” effect across the western horizon. This alteration will fundamentally change the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that contribute significantly to the area's environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment lacks any evaluation of the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This omission is particularly concerning given the significance of dark skies to the local identity and the development of tourism sectors such as astro-tourism. Consequently, the failure to consider these impacts results in a notable gap in the overall landscape and environmental assessment.

Moreover, there is no assessment of the impacts on nocturnal wildlife, which is a critical oversight. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are especially sensitive to artificial lighting, as they can become disoriented and face increased risks of collision. The application does not provide a lighting impact assessment or a study on phototaxis, thus failing to consider how aviation lighting may affect these species or contribute to higher mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this omission, as it does not account for nocturnal activity or associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data leaves a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission is in conflict with National Planning Framework 4 regarding the protection of natural places and the quality of the environment. It also undermines the broader evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall landscape.

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

TOURISM

The evaluation of tourism impacts is critically inadequate, neglecting to assess the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. While the application 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, behaviours, or the overall economic contribution.

Tourism has seen substantial growth, with income rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not address how the industrialisation of the seascape and the resultant loss of environmental quality would affect Tourism Gross Value Added or broader economic resilience. Without this analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the role of unspoiled landscapes and dark skies in enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a substantial gap in the understanding of impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to evaluate tourism impacts has broader consequences for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately appraised as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with 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 furnish sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependencies culminates in a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm exemplifies a significant failure to meet the principles of sustainable development, as it fails to align with statutory duties, national policy, and evidential standards. This application revisits the core concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. The current proposal is put

forward within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis for assessment, with significant gaps in baseline data. It employs an undefined design envelope and depends on unspecified mitigation measures while failing to address critical impact pathways, including nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

There are notable procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the lack of a full Social Impact Assessment constitutes a substantial omission. These deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. Moreover, 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.

The 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 sometimes contradictory. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

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

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

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

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: 692344F9

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

Dear Sir/Madam

This letter formally objects to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. The objection is founded on a thorough review of the Environmental Impact Assessment Report and related materials, revealing significant planning, environmental, cultural, and procedural shortcomings. The wind farm is proposed for the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project with statutory requirements, national policies, and sustainable development principles due to its scale, proximity to the shore, and design.

The application lacks a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Moreover, several key elements of the proposal remain undefined. The flexible design framework used complicates the understanding of potential significant effects, while the dependence on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal contradicts the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate issues, and environmental integrity. These conflicts directly challenge the statutory tests for consent and weaken the competent authority's ability to affirm that the project aligns with policy standards.

The unprecedented scale of the proposal, featuring large turbines in close proximity to the coastline, raises serious concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the deficiencies in information, dependence on undefined mitigation, evidential gaps, and clear policy violations indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, clear, or dependable account of the likely environmental impacts

associated with the proposal. The incorporation of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hinders the consistent application of a worst-case scenario analysis. This compromises the assessment's integrity, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a true understanding of the environmental implications.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought with the expectation that environmental harm will be mitigated later, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be thoroughly established before determination.

There are notable evidential inadequacies, including a lack of baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where negligible or non-significant effects are concluded without substantial supporting data. The deficiency of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not meet the evidential standard set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, particularly the requirements related to biodiversity protection and environmental integrity, as it does not provide evidence that impacts have been fully assessed or that suitable safeguards are implemented.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and rigorous assessment of environmental effects, meaning that the competent authority is not positioned to make a determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of a thorough and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative detailing the evolution of the project. This method does not convincingly demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

Moreover, there is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not show that the developer has adequately considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impacts further highlight the absence of this analysis, which undermines any claims that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to cable routing and landfall assessment, revealing insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis signifies that mitigation by design has not been effectively applied, leading to a reliance on post-design mitigation measures instead.

Ultimately, the application does not show that environmental harm has been minimised through the careful selection of site, layout, and routing of infrastructure. This reflects a failure to adhere to the established mitigation hierarchy and obstructs the competent authority's ability to ascertain the existence of less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a material omission, reinforcing the conclusion that the application has not been properly assessed and is incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly deficient, failing to provide a complete and reliable understanding of the ecological receptors present. This area represents a highly sensitive and biologically active marine system, yet the baseline data collected is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

One major oversight pertains to otters, classified as a European Protected Species, which the application does not adequately recognise or assess regarding their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behavioural patterns raises concerns, as the potential effects of construction-related disturbances, noise, and heightened activity have not been thoroughly evaluated. This significant omission undermines the conclusions drawn

about the absence of serious effects on this species.

Additional shortcomings are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The neglect to incorporate or adequately consider such pertinent data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws result in conclusions of negligible or non-significant effects being based on assumptions instead of robust evidence. The lack of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This situation creates uncertainty about the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application has significant flaws in its ornithological assessment, which presents major gaps in evidence and inconsistencies that undermine its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already declining. However, the application fails to convincingly show that these species will not be negatively impacted. The development site is situated within critical foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or habitat loss.

There is a notable contradiction within the application. The developer claims that there are no significant adverse effects while also putting forward a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This inconsistency raises doubts about the assessment's reliability and suggests that its conclusions are not adequately backed by the evidence provided.

Furthermore, the assessment lacks sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The

importance of these feeding grounds is not fully addressed, and the reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars that are in serious decline. The methodologies used are likely to underestimate mortality, particularly given incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor adds another serious risk, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not properly evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations.

Regulatory compliance is also questionable, as the application does not meet the evidential standard required to assert that there will be no adverse effect on the integrity of protected sites. The contradictory conclusions, combined with data deficiencies and modelling constraints, indicate that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and inhibits a lawful decision in favour of consent.

Overall, the deficiencies identified reflect 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 puts the proposal at odds with national policy. These issues collectively render the assessment unreliable due to inconsistencies, methodological flaws, and insufficient evidence, ultimately leading to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply interwoven. It adopts an overly simplistic view by treating cultural heritage merely as isolated and unchanging assets, rather than as dynamic elements with ongoing social, cultural, and spiritual significance within the community.

Cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites for burial and spiritual practices, are mischaracterised as static features. This oversight neglects their continuous use and meaning, as well as the potential effects of development on their surroundings. As a result, the evaluation of cultural impacts remains fundamentally incomplete and overlooks the vital role these sites play in community life.

Moreover, the absence of consideration for intangible cultural heritage, such as the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment, is a critical shortcoming. These elements are essential to the identity of the area but have been completely disregarded in the assessment, leading to a failure in understanding the true cultural implications of the development.

There are serious concerns regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been consulted through a Free, Prior and Informed Consent process. This lack of meaningful engagement raises questions about the legitimacy of the assessment and contradicts established principles that promote participation in decisions impacting cultural and environmental interests.

Additionally, there is a significant procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission means the competent authority cannot legally assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These oversights also place the proposal at odds with the National Planning Framework 4, specifically concerning the protection of historic assets and spaces. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices clearly deviates from policy obligations.

Ultimately, the inability to adequately assess living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application lacks a sound basis for determining the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a critical issue that compromises the integrity of the planning application. The developer's own focus groups with local residents indicate that there are measurable levels of stress, anxiety, and concern regarding the proposal's scale and proximity. These impacts, derived from direct engagement, highlight an ongoing situation that cannot be dismissed as speculative. However, the absence of the full report hampers the ability of both the public and the competent authority to understand the comprehensive social risks identified.

This lack of transparency also extends to the perceived threat the proposal poses to community identity and cohesion, with "cultural loss" explicitly mentioned in the developer's findings. Yet, these serious concerns have not been adequately reflected in the main application, nor have they been given the attention they warrant. By withholding the complete Social Impact Assessment, the true human and social costs associated with the development remain obscured.

The implications for the Environmental Impact Assessment process are profound. A thorough understanding of the social, economic, and health impacts is essential for developments of this magnitude, especially when considering potential effects on community character and functioning. Without access to the full dataset, the application lacks a robust evidential foundation for evaluating the balance between

potential benefits and harms.

From a policy standpoint, the application does not comply with the National Planning Framework 4 regarding health and wellbeing. It is imperative for developments to support positive health outcomes and mitigate harm. The existing evidence of adverse effects, which has not been fully disclosed, calls into question the application's adherence to this policy.

Furthermore, the procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This oversight represents a material omission in the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

Overall, the failure to disclose the full Social Impact Assessment, coupled with clear evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation undermines the possibility of a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and dominant industrial presence, fundamentally altering this character and causing a permanent and irreversible transformation of the landscape.

The application does not sufficiently represent the magnitude of the visual change that would occur. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and widely used coastal locations. This situation would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment fails to effectively convey the significance of these impacts in the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

Furthermore, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape setting by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated assets rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and

cultural significance.

The anticipated industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This signifies not just a visual impact but also a broader cultural and spatial harm that has not been adequately considered within the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, which are critical for understanding potential environmental impacts. The intended seabed preparation and installation works are set to occur within a dynamic Atlantic environment; however, there is a lack of comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, the application leans on the establishment of mitigation and contingency measures post-consent, which renders any assessment of their effectiveness or adequacy impossible at this stage.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises substantial concerns. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to contamination and sediment disturbance. Although the application identifies risks like sediment mobilisation and accidental spills of chemicals or oil, it fails to offer adequate strategies for preventing, controlling, or monitoring these occurrences.

Additionally, there is notable uncertainty surrounding the scale and behaviour of sediment plumes that could result from the proposed seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it remains unclear what the ecological impacts, duration, and extent of these

disturbances might be. This uncertainty also encompasses potential effects on sensitive marine species and habitats already recognised in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application hinders the assessment of whether sufficient safeguards exist to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to properly evaluate environmental protection measures during the determination process.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Evaluations of likely significant effects and mitigations must be conducted prior to granting consent. The lack of critical information not only hampers lawful determination but also demonstrates non-compliance with policy stipulations regarding environmental protection and water quality.

In summary, the deficiencies outlined—such as the absence of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts—render the assessment fundamentally flawed. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application presents an inadequate assessment of fisheries and marine life. It fails to offer a robust evaluation of both ecological and socio-economic impacts, raising immediate concerns about the potential disruption to these critical uses and habitats.

A primary flaw lies in the assumption that fishing activity can be displaced without any consequences. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This significant omission poses risks of overfishing in other areas and could lead to wider economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, the implications for fisheries and local livelihoods remain obscure.

The proposal introduces serious risks to marine species, notably due to underwater noise generated during construction activities. The use of high-energy hammer piling over an extended period is likely to disrupt species such as dolphins across considerable distances. The projected impact on a notable portion of the local bottlenose dolphin population raises urgent concerns, yet the application downplays these effects, lacking sufficient supporting evidence.

There is a troubling inconsistency in the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously

characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises significant questions about compliance with the Habitats Regulations, especially where anticipated harm would require legal authorisation.

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

From a policy standpoint, the application does not comply with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus preventing any assertion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant shortcomings in its assessment of onshore infrastructure, which is critical to understanding the full impact of what is fundamentally an integrated project. The offshore turbines and the associated onshore works are interdependent, yet they have been evaluated separately. This division results in a fragmented analysis that fails to capture the comprehensive environmental and socio-economic repercussions.

Among the onshore elements are cabling that crosses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. Notably, the excavation required for these works occurs in areas of deep peat, particularly in Barvas Moor, which serves as an important carbon store and is an ecologically sensitive habitat. The lack of a thorough assessment of these impacts hinders a complete understanding of the project's environmental footprint.

By postponing or omitting the evaluation of onshore impacts, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered collectively, yet the segregation of offshore and onshore components obscures the total impacts on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application fails to adequately demonstrate that the impacts on these habitats have been fully considered or that

effective avoidance measures have been applied, leading to a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbing peatland results in the release of stored carbon, potentially leading to a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this critical issue or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, casting doubt on the project's feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project as a whole, alongside the inability to ensure protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation of impacts further diminishes the reliability of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposed development introduces permanent red aviation lighting that will be visible over considerable distances, creating a disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There is a significant omission in the Environmental Impact Assessment, as it does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This gap is critical, especially considering the growing importance of dark skies to the area's identity and sectors like astro-tourism.

Moreover, the absence of any evaluation regarding nocturnal wildlife is alarming. Notable 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 a heightened risk of collision. The application fails to provide a lighting impact assessment or a phototaxis study, neglecting to consider how aviation lighting may adversely affect these species or potentially increase mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the

ornithological assessment, which fails to capture the nocturnal activity and risks associated with species like Kittiwakes that may forage or migrate at night. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts of the proposed development.

Without an assessment of these nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard necessary 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 regarding the protection of natural places and environmental quality, further undermining the overall landscape and seascape impact evaluation, as the character of night-time is an essential component of the environment.

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

TOURISM

The assessment of tourism impacts within the application is fundamentally inadequate, neglecting to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. The success of tourism is intricately linked to the area's wild coastline, near-pristine landscapes, dark skies, and a prevailing sense of remoteness. Notably, the application acknowledges that 86% of visitors are attracted by the scenery; however, it fails to provide a quantified evaluation of how the proposed large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions derived from tourism.

This sector has experienced substantial growth, with its value rising from £65 million in 2017 to over £81.5 million, thereby supporting in excess of 1,000 jobs and constituting up to 16% of the island's economy. Despite this impressive growth, the application does not model the potential impacts of industrialisation on the seascape or the anticipated decline in environmental quality on Tourism Gross Value Added or broader economic resilience. As a result, it remains unclear whether the proposed development would yield a net economic benefit or detract from an established and thriving industry.

Furthermore, the assessment neglects to address the significance of environmental quality in enhancing the tourism experience, particularly highlighting the crucial role of unspoiled landscapes and dark skies in attracting visitors. The absence of a Dark Skies Assessment exacerbates this inadequacy, creating a considerable gap in understanding the impacts on an acknowledged and expanding segment of the local economy, notably nature-based tourism and astro-tourism.

In light of the island community's limited economic diversification, the failure to assess

tourism impacts carries broader implications for local employment, businesses, and overall community sustainability. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been thoroughly evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not sufficiently demonstrate compliance with the National Planning Framework 4, particularly regarding economic impact and the requisite to establish a net benefit. It stands in opposition to strategic objectives that deem tourism a priority growth sector, lacking the necessary evidence for the competent authority to properly assess the economic consequences of the proposal.

In summary, the combined failures to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency culminate in a significant evidential shortfall. This deficiency hinders a comprehensive evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: AB63CE5C

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents reveals several material deficiencies related to planning, the environment, cultural considerations, and procedural matters. The development is set to take place off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which may not align with statutory requirements, national policy, or the principles of sustainable development.

The application does not provide a sufficient evidential basis for lawful determination. It lacks critical environmental data, has limited and inconsistent baseline information, and key elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not allow for a comprehensive understanding of potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by adequate evidence.

Substantial policy conflicts are evident in the proposal, which appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These inconsistencies are particularly apparent concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical to the statutory tests necessary for consent and compromise the competent authority's ability to determine the development's policy acceptability.

The unprecedented scale of the proposal includes large turbines located close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, undefined mitigation, evidential weaknesses, 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 applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal lacks a comprehensive and reliable Environmental Impact Assessment Report, which fails to adequately detail the potential environmental effects associated

with the development. A flexible Project Design Envelope is utilised without clear commitments to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the ability to apply a consistent worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development, thereby obstructing both public and competent authority understanding of the true environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that are not yet defined. This means that consent is sought on the assumption that any environmental harm will be managed at a later stage, which hampers meaningful evaluation of the effectiveness of these measures or assessment of any residual impacts. Such deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established before determination.

There are also serious evidential gaps, including deficiencies in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty about the scale and significance of impacts, especially in cases where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. The proposal also fails to comply with National Planning Framework 4, particularly in aspects related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings impede a lawful and robust assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

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

alternatives.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species presented in the application is fundamentally flawed and cannot be relied upon to provide an accurate understanding of the ecological receptors in the West Lewis coastal area. This marine environment is both highly sensitive and biologically vibrant, yet the baseline data is insufficient and the methodologies used do not effectively capture essential aspects of species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for determining the potential impacts.

Significantly, the assessment fails to appropriately recognise the presence of otters, a species protected under European law, in relation to their foraging and movement along coastal regions. The oversight in accounting for their core foraging range and

behavioural patterns means that the potential impacts from construction disturbances, noise, and increased activity have not been thoroughly evaluated. This oversight undermines any claims regarding the absence of significant impacts on otters.

In addition, the assessment of basking sharks reveals further shortcomings, particularly due to the reliance on aerial surveys which are subject to substantial detection bias, especially under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, particularly when compared to established land-based observations that indicate regular usage of these waters. The exclusion or inadequate consideration of such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological deficiencies lead to conclusions regarding negligible or non-significant effects being rooted in assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful examination of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty surrounding the real level of risk to marine species and habitats.

From a regulatory viewpoint, the application does not comply with the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has failed to accurately identify and assess protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

Overall, the combination of insufficient baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of the impacts on marine ecology and protected species and reinforce the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability due to substantial internal inconsistencies and methodological weaknesses. It is crucial to highlight that the application fails to provide adequate evidence that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. The site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly evaluated.

A fundamental contradiction exists within the application itself; while the developer asserts that there are no significant adverse effects, they simultaneously present a case for Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. Furthermore, the methodologies used in the assessment are likely

to underestimate mortality rates, especially for species like Kittiwakes and Fulmars, where baseline data is lacking and behavioural responses remain unclear.

The positioning of turbines within a recognised migratory corridor presents an additional risk, as it creates a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. There has been insufficient evaluation of the long-term consequences of sustained mortality in this corridor or the potential repercussions on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment represent a failure to adhere to the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that these critical seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is fundamentally flawed, characterised by internal inconsistencies, inadequate methodologies, and a lack of sufficient evidence. These issues collectively hinder a thorough evaluation of impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment regarding cultural heritage and community identity is significantly flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The application approaches heritage in a limited manner, viewing it merely as a collection of isolated, static assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

Moreover, the application does not take into account the intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the longstanding

connection between the community and the coastal environment. These elements are essential to the area's identity but are wholly omitted from the assessment, which is a critical gap. Without addressing these factors, the cultural implications of the development cannot be fully grasped.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking community has a unique cultural identity that aligns with recognised characteristics of Indigenous Peoples. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a significant procedural flaw in the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering the process unlawful.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, as well as the failure to recognise living cultural practices, constitutes a clear violation of policy standards.

In summary, the inadequate assessment of living heritage, intangible cultural value, community rights, and legal responsibilities results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current application presents a materially deficient assessment of social impacts, health, and wellbeing, lacking the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the full report has not been released. This represents a significant evidential gap that hinders both public understanding and the competent authority's capacity to grasp the full extent of social risks highlighted by the developer's research.

Evidence suggests that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, which stems from direct engagement rather than speculative assertions. Nevertheless, without disclosure of the complete assessment, proper scrutiny of these findings is obstructed, limiting the evaluation of their significance in the decision-making process.

Moreover, there is a prevailing perception that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" identified as a concern in the

developer's own findings. Despite this acknowledgment, the 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 poses challenges to the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly those that may affect community character and functioning. The failure to provide the full dataset results in an incomplete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is imperative that development supports positive health outcomes and mitigates harm. The existing evidence indicates adverse effects that remain undisclosed, thereby hindering the demonstration of compliance with relevant policy.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material failure within the application, failing to meet the evidential standards required by the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a permanent and irreversible alteration of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to adequately represent 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 dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. However, the application does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence suggesting that these viewpoints may not fully reflect the most sensitive receptors or worst-case scenarios, particularly with respect to key

cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, consequently undermining the reliability of the assessment.

Moreover, the assessment fails to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Rather than recognising their interdependence, the assessment treats these as isolated assets, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The anticipated scale of change contradicts the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further calls into question any assertion of compliance with policy requirements.

Additionally, it is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable, leading to changes that are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is fundamentally lacking, failing to provide the necessary detail to evaluate the potential environmental impacts adequately. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that would only be developed after consent, which precludes any thorough evaluation of their effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which is home to clean coastal waters

and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not offer adequate detail on how these issues will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether suitable safeguards are in place to respond to pollution incidents. This approach introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant likely effects and mitigations must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries in the application is inadequate, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The West Lewis coast is home to a vibrant marine ecosystem and an active fishing industry. However, the proposal does not adequately demonstrate how these essential habitats and industries can be safeguarded from significant disruption.

A critical concern is the assumption that fishing activities can simply be relocated without negative consequences. The application lacks evidence supporting the availability, accessibility, and capacity of alternative fishing grounds to absorb any increased pressure. This absence of information is notable, as displacement could lead to overfishing in other areas and result in broader economic ramifications for the local fishing fleet. Without a solid and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, impacting species 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 evidence.

Inconsistencies within the application are evident, particularly in the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to address cumulative impacts that may arise from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these collective effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal aligns with sustainable development principles.

Ultimately, the lack of evidence regarding the displacement of fishing activities, the underestimation of acoustic impacts, and internal contradictions render the assessment incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure associated with this project is fundamentally lacking and does not take into account the full range of impacts resulting from what constitutes a single integrated development. The offshore turbines and the onshore works are inherently interconnected; however, they are evaluated in isolation, leading to a disjointed approach that conceals the true magnitude of environmental and socio-economic consequences.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure traversing sensitive landscapes. These activities necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a significant carbon reserve and is an ecologically sensitive environment. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be examined collectively; yet the disjunction of offshore and onshore elements means that the combined effects on peatlands, habitats, and local communities remain inadequately understood.

Moreover, the proposal raises substantial concerns regarding carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that runs counter to the goals of renewable energy initiatives. The application does not sufficiently address this concern or confirm that the overall carbon balance is favourable.

There are notable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy measures. The application does not establish that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance strategies have been implemented. This reveals a significant evidential gap in terms of biodiversity protection.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land uses and legal entitlements. The application lacks evidence that the requisite consents or procedures have been initiated, raising doubts about the feasibility and lawful execution of the project.

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

In conclusion, the fragmentation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts culminate in a submission that is incomplete and unreliable, thereby preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment for this proposal fails to address critical aspects regarding dark skies and nocturnal wildlife, representing a significant omission. The West Lewis coastline is noted for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism value. However, the introduction of permanent red aviation lighting, which is visible over extensive distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The application lacks an evaluation of the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is

particularly concerning given the role of dark skies in the area's identity and the emerging astro-tourism sector. The absence of such an assessment indicates a clear gap in the landscape and environmental evaluation.

Moreover, the assessment does not consider the impacts on nocturnal wildlife, including sensitive species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are affected by artificial lighting due to phototaxis. This can lead to disorientation and increased risks of collision. The application does not include any lighting impact assessment or phototaxis study, thereby failing to evaluate how the proposed aviation lighting could affect these species and potentially increase mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects nocturnal activity and its associated risks. Kittiwakes, for example, may forage or migrate at night and are similarly susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy perspective, these omissions conflict with the National Planning Framework 4, which emphasises the importance of protecting natural places and maintaining environmental quality. This gap in assessment also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the broader ecological framework.

In conclusion, the absence of any assessment related to dark skies and nocturnal wildlife creates a significant evidential shortfall. The lack of baseline data, impact modelling, and species-specific analysis results in an application that is incomplete and inadequate for supporting a lawful determination.

TOURISM

The application demonstrates a critical deficiency in assessing tourism impacts, which is vital for a significant sector of the Isle of Lewis economy. The region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness are essential to attracting visitors. It is noted that 86% of tourists are motivated by the scenery, yet the application lacks a quantified assessment of how the proposed large-scale offshore infrastructure may influence visitor numbers, behaviours, or their overall economic contributions.

Tourism is not just a mere attraction; it has seen significant growth, with revenue increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000

jobs and constituting up to 16% of the island's economy. However, the application does not explore the potential impacts of seascape industrialisation and the degradation of environmental quality on Tourism Gross Value Added or broader economic resilience. This absence of analysis makes it impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment overlooks the critical role environmental quality plays in tourism. Unspoiled landscapes and dark skies enhance visitor experiences and are increasingly important to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a substantial gap in understanding the repercussions on a recognised and burgeoning component of the local economy.

In an island community with limited economic diversification, neglecting the impacts on tourism carries wider 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 adequately examined, contrary to the requirements outlined in the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to prove alignment with the National Planning Framework 4, particularly regarding economic impact and the essential demonstration of net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to provide the competent authority with adequate evidence to evaluate the economic ramifications of the proposal.

In conclusion, the failure to quantify tourism impacts, evaluate the environmental factors driving visitor behaviour, and recognise the island's economic dependence results in a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the same central issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This new proposal is now presented within a policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still falls short.

A complete and reliable evidential basis for determination is not provided. There are notable gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and the exclusion of crucial impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of the likely significant effects or residual impacts.

Moreover, clear procedural failures are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to disclose the entire Social Impact Assessment constitutes a serious omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and impeding a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

The Isle of Lewis is a place of rare and special beauty, its mystery and historic culture must be preserved. It is one of the last Wild places in Britain with a fragile natural culture already.

How very cynical and sly it is that this project has been put forward without the consent of the Islanders, those whose lives will be adversely affected by it.

They will not gain from the power raised as it will go - without consent again- to the National Grid

This is a clear example of business riding roughshod over small communities and disregarding the lives of those paying the real price for it.

Loss of the beauty of their home environment, emotional stress causing untold damage, destruction of the seabed , killing of millions of seabirds, etc, etc.

What is so cynical is that wave power would create plenty of green power , and not scar the environment in the same way.

Norway- a very similar landscape has embraced that technology for decades with great success.

My Father was a Lewis man and an engineer and would have hated this colonial attitude to so called progress. RE-THINK THIS TERRIBLE IDEA

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: AB7ED8C9

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 application presents a number of significant deficiencies that undermine the credibility of the Environmental Impact Assessment Report. A flexible Project Design Envelope is proposed, lacking specific turbine dimensions, layouts, or configurations, which introduces considerable uncertainty. This ambiguity hinders a consistent worst-case scenario application, thereby compromising the integrity of the assessment. Consequently, the impacts described may not accurately represent the development that is ultimately realised, obstructing both public understanding and the competent authority's ability to grasp the true environmental implications.

Moreover, the proposal heavily depends on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. As consent is sought on the basis that these environmental harms will be addressed later, this prevents any meaningful evaluation of their effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent stages contradicts the procedural intent of the Environmental Impact Assessment regime, which mandates that significant effects and corresponding mitigation must be established clearly before any determination is made.

Additionally, the report suffers from serious evidential deficiencies. There are notable gaps in baseline data and limitations in the methodology employed, with a tendency to rely on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale 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 and introduces scientific uncertainty that is incompatible with statutory requirements.

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

In conclusion, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings inhibit a lawful and thorough assessment of environmental effects, meaning the competent authority cannot make a well-informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The absence of a structured and evidence-based assessment of alternatives is a serious concern that undermines the integrity of the Environmental Impact Assessment

regime. The application fails to provide a comprehensive comparison of potential offshore locations, development scales, or design configurations that could have been less harmful. Instead, it offers a narrative account detailing the evolution of the project, without showing that the developer has genuinely considered more environmentally friendly options, particularly those that could involve placing turbines further offshore. Given the significance of the West Lewis coastline, the proximity to shore plays a crucial role in determining impacts. This lack of analysis prevents any conclusion that the proposed siting is indeed the least damaging option available.

The inadequacies are further evident in the cable routing and landfall assessment, where the evidence suggesting that alternative routes have been explored is insufficient. This oversight includes sensitive areas with cultural and spiritual significance, such as Barvas Cemetery. The failure to implement a clear avoidance strategy and the absence of comparative analysis indicate a reliance on post-design mitigation measures rather than proactive measures designed to minimise harm.

Consequently, the application does not adequately demonstrate that environmental harm has been mitigated through careful site selection, layout, and routing of infrastructure. This neglect breaches the established mitigation hierarchy and leaves the competent authority unable to ascertain whether less damaging alternatives exist. Without a thorough assessment of alternatives, it cannot be claimed that the proposal is a sustainable or compliant solution.

From a policy standpoint, these deficiencies compromise adherence to the National Planning Framework 4, particularly regarding the safeguarding of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a significant omission, ultimately leading to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system. The assessment of marine ecology and protected species fails to provide a complete or reliable understanding of ecological receptors in this area. 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 basis for evaluating potential impacts.

A significant omission is the failure to properly recognise and assess otters, a European Protected Species, which actively use coastal areas for foraging and movement. The application does not adequately consider their core foraging range and behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been sufficiently assessed, undermining any conclusions about the absence of significant effects on otters.

Further shortcomings exist in the assessment of basking sharks. The reliance on aerial

surveys introduces substantial 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 frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions.

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

From a regulatory standpoint, the application does not meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the precautionary principle. Under 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 impede a robust evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate that internationally important seabird populations will not be adversely affected, which puts it in direct conflict with national policy regarding biodiversity protection. The west coast of the Isle of Lewis is home to many seabird species, several of which are already in decline. The proposed development is situated within crucial foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application, as the developer asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the ornithological assessment, revealing that its conclusions lack the necessary support from the available evidence. The assessment does not convincingly show that seabirds connected to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The methodologies employed are likely to underestimate mortality, particularly given incomplete baseline data and the incomplete understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional and severe risk, forming a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term consequences of

sustained mortality in this corridor are not sufficiently addressed, nor are the potential impacts on species with smaller global populations.

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

The flaws identified in the assessment represent a failure to comply with National Planning Framework 4 regarding the safeguarding of natural assets. Collectively, these deficiencies result in an unreliable assessment due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is significantly deficient and overlooks the West Lewis coastline's status as a dynamic cultural landscape, where the environment, language, tradition, and community are interconnected. The application employs a simplistic approach that treats heritage as discrete, unchanging assets, neglecting their ongoing social, cultural, and spiritual relevance 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 places for burial and spiritual practice; however, the assessment categorises them merely as static elements, failing to acknowledge their continued use and significance, as well as the potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their vital role in community life.

Moreover, the application does not account for intangible cultural heritage aspects, including the Gaelic language and local traditions, as well as the enduring relationship between the community and its coastal environment. These components are essential to the region's identity yet are conspicuously absent from the assessment, representing a critical oversight. Without addressing these elements, the true cultural impact of the development remains poorly understood.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet the process of Free, Prior and Informed Consent has not been implemented. The lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles concerning participation in decisions that affect cultural and environmental interests.

Additionally, a significant procedural error is the omission of a compliant Island Communities Impact Assessment, which is a statutory obligation under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This gap alone renders the determination of the application unlawful.

From a policy standpoint, these shortcomings place the proposal in direct violation of National Planning Framework 4, particularly regarding the protection of historic assets and sites. The failure to take into account both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from policy mandates.

In summary, the lack of assessment concerning living heritage, intangible cultural values, community rights, and statutory requirements results in a substantial evidential gap. The cultural ramifications of the development have not been adequately appraised, and the application fails to present a sufficient basis for assessing the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The procedural implications of the current application are substantial. The absence of the full Social Impact Assessment hinders the competent authority's ability to carry out a thorough socio-economic and health evaluation. This significant omission compromises the application's compliance with the evidential requirements set forth by the Environmental Impact Assessment regime.

Furthermore, the assessment of social impacts, health, and wellbeing is notably inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This gap in evidence prevents both the public and the competent authority from gaining a comprehensive understanding of the social risks highlighted by the developer's research.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts, drawn from direct engagement, are factual rather than speculative. The failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings, affecting the significance of these impacts in the decision-making process.

Additionally, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's own findings. Despite this, these impacts have not been adequately integrated into the main application or accorded the weight they warrant. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A complete understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. The application fails to provide a comprehensive evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development must foster positive health outcomes while avoiding harm. However, the evidence presented indicates existing adverse effects that have not been fully disclosed, making it impossible to demonstrate compliance in the absence of the complete assessment.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological concerns arise in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may fail to fully capture the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the true magnitude of visual impact has been understated, thus undermining the credibility of the assessment.

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

incomplete analysis of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks related to construction and pollution is lacking and does not include the necessary detail to evaluate potential environmental effects. The project involves significant seabed preparation and installation activities in a high-energy Atlantic setting, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be prepared after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependence on unspecified future measures raises particular concerns, especially considering the sensitivity of the environment. The West Lewis coastline features clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental spills of chemicals or oil, it lacks adequate information on how these issues will be prevented, controlled, or monitored.

There is also ambiguity about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already

recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and undermines the capability of the competent authority to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the demands of the Environmental Impact Assessment regime. It is necessary to evaluate likely significant effects and mitigation before consent, and without this information, a lawful determination cannot be achieved. Moreover, the application fails to show compliance with policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a concerning inadequacy in the assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate that these vital uses and habitats can be preserved without significant disruption.

One of the major concerns is the flawed assumption that fishing activity can be displaced without repercussions. The absence of evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle increased pressure is notable. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. Without a solid, evidence-based assessment, it remains impossible to accurately gauge the impacts on fisheries and the livelihoods that depend on them.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb a wide area, potentially affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious red flags, yet the application downplays these concerns without adequate supporting evidence.

There is a glaring inconsistency in the application where the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously, the

impacts are described as negligible. This contradiction casts doubt on the credibility of the assessment and raises serious compliance issues with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Lacking a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the proposal can be considered sustainable development.

Overall, the deficiencies in demonstrating evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application result in an incomplete and unreliable assessment. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure presents significant gaps and fails to fully recognise the interconnected nature of the project. The offshore turbines and onshore works should be considered as one integrated project; however, the separate evaluations obscure the true magnitude of environmental and socio-economic effects, resulting in a fragmented understanding.

Onshore activities encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure that traverses sensitive landscapes. These undertakings involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which hampers a comprehensive understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application limits the evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the division between offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain unclear.

There are also notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to demonstrate that these habitats have been thoroughly assessed or that suitable avoidance measures have been adopted. This evidential gap poses a threat to

biodiversity protection.

Additionally, there are concerns about carbon balance due to the disturbance of peatland, which releases stored carbon and may lead to a carbon debt, counteracting the aims of renewable energy development. The application does not sufficiently tackle this concern or show that the overall carbon balance is advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with current land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, casting doubt on the project's feasibility and legality.

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

In summary, the disconnection of project components, absence of a comprehensive assessment, and lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment of the West Lewis coastline, which is characterised by exceptionally dark skies. These dark skies are vital to the area's environmental quality, cultural identity, and tourism value, yet the Environmental Impact Assessment completely omits any consideration of dark skies and nocturnal wildlife.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the significant importance of dark skies to local identity and emerging tourism sectors, including astro-tourism. This lack of assessment creates a clear gap in the overall landscape and environmental evaluation.

Moreover, the assessment does not address the potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased collision risk. The application lacks a lighting impact assessment or phototaxis study, failing to evaluate how the proposed aviation lighting could affect these species or raise mortality rates.

This omission is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also susceptible

to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without a proper assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would suffer adverse effects. The necessary evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, which engages the precautionary principle and prevents lawful determination.

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

TOURISM

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

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

Furthermore, the assessment neglects to examine the significance of environmental quality for tourism, particularly regarding the value of unspoiled landscapes and dark skies to the visitor experience. This is especially relevant for growing sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, resulting in a considerable shortfall in understanding the implications for an acknowledged and emerging facet of the local economy.

Considering that the island community possesses limited economic diversity, the

oversight in assessing tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated as mandated by the Islands (Scotland) Act 2018.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is presented under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable deficiencies in the evidential basis required for determination. The application is marred by critical gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and a failure to address significant impact pathways, particularly concerning nocturnal wildlife, the entirety of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or any residual impacts.

Procedural failures are also evident in the application. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated in the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment constitutes a material omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. The impacts on health and wellbeing are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from offshore and

onshore elements has not been adequately conducted, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain both uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The required evidential threshold to confirm that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

To whom it may concern,

I can see the Hebrides from my home. We have friends who live there. We don't appreciate the planned change of view.

Scotland is being coated in wind farms. It's becoming difficult to find areas that you can't see them. One of the reasons we moved here is because there aren't any wind farms!

I personally feel that the most beautiful landscapes in Scotland should be preserved. There are extremely few people who would state that they enjoy the appearance of wind turbines.

Additionally, it's well documented that turbines have caused significant damage to bird populations, including endangered species. If they are spread out everywhere, then we won't have any safe areas for wildlife and there also won't be any areas where people can enjoy natural beauty without seeing humankind's damage to the environment.

Significant damage to the seabed will also be caused during the installation of the mega structures.

On the face of it. This project is just a money making venture by wealthy companies who live far away from the impacts.

Scotland already has enough wind power to power the whole country, with excess being exported. Turbines are switched off on high power days, because there's nowhere to store the extra energy. Maybe a better idea would be to upgrade existing energy storage potential, rather than just simply building more wind farms. That way we'd have the same amount of wind turbines that we already have and more energy from them.

You're sincerely.

[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: 021615E4

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is based on a review of the Environmental Impact Assessment Report and related documents, highlighting various deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information presented is limited and inconsistent. Moreover, key aspects of the proposal remain undefined. The flexible design framework used impedes a clear understanding of likely significant effects. Additionally, reliance on unspecified mitigation measures prevents assessment of their effectiveness. Consequently, the documentation fails to provide a full understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by robust evidence.

Substantial policy conflicts are evident. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests needed for consent and weaken the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns, especially with large turbines positioned close to the shoreline, which impacts landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must be applied in these circumstances.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to provide a comprehensive, transparent, or dependable analysis of the potential environmental impacts of the proposal. The adoption of a flexible Project Design Envelope, which lacks a commitment to specific turbine dimensions, layouts, or configurations, introduces a substantial degree of uncertainty. This approach hinders a consistent evaluation of the worst-case scenario, undermining the assessment's integrity and obstructing both public understanding and that of the competent authority regarding the actual extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, management plans, and monitoring strategies that remain undefined. Consent is sought on the premise that any environmental harm will be managed at a later stage, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is not procedurally acceptable and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly delineated before determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions in place of site-specific evidence. Such issues result in uncertainty regarding the scale and significance of the impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information impedes a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it fails to establish that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the reliance on an ambiguous design envelope, the absence of clearly defined mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application does not satisfy the statutory requirements of the Environmental Impact Assessment regime, particularly with regard to the assessment of alternatives. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it presents a narrative account of the project's evolution. This approach does not adequately demonstrate that less harmful options

have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a significant lack of transparent and evidence-based comparison concerning alternative offshore locations, development scales, or design configurations. Specifically, the application fails to show that the developer has considered the potential of locating 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 environmental impact, the failure to conduct such analysis means that it cannot be concluded that the proposed siting is the least damaging option available.

Further deficiencies are evident in the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis suggest that there has been no application of mitigation by design, which has led to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and prevents the competent authority from determining whether there are less harmful and more suitable alternatives available. Without a comprehensive alternatives assessment, it cannot be asserted that the proposal constitutes 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 material omission that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to deliver a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is both sensitive and biologically rich, yet the available baseline data is inadequate, and the methodologies employed do not sufficiently document species presence, behaviour, or habitat usage. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A significant oversight concerns otters, classified as a European Protected Species. The application does not adequately acknowledge or assess their use of coastal areas for foraging and movement. The failure to evaluate their core foraging range and

behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been sufficiently examined. This gap undermines any assertions regarding a lack of significant effects on this species.

In addition, the assessment of basking sharks is problematic. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared to established land-based observations that show frequent use of these waters. The failure to adequately incorporate such data leads to an incomplete baseline and diminishes the reliability of the conclusions presented.

The limitations in methodology result in conclusions about negligible or non-significant effects being based on assumptions rather than solid evidence. Without sufficient baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and broader ecosystem interactions. This situation raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, marked by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The site is situated within crucial foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already experiencing decline. However, the application fails to demonstrate, to the requisite evidential standard, that these species will not be adversely affected.

A critical contradiction arises in the assessment, as the developer asserts there are no significant adverse effects while simultaneously putting forward a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency casts doubt on the assessment's reliability and suggests that the conclusions drawn are unsupported by the evidence presented. The assessment does not adequately substantiate that seabirds associated with protected sites, such as the

Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is insufficiently considered, and reliance on modelling approaches injects uncertainty, especially for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are prone to underestimating mortality, particularly given that baseline data may be incomplete and behavioural responses inadequately understood.

The positioning of turbines within a recognised migratory corridor creates an additional and significant risk, effectively serving as a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate 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 fails to satisfy the evidential threshold required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling deficiencies, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

Furthermore, the identified deficiencies constitute non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected positions the proposal in direct opposition to national policy.

Ultimately, 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 collectively lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally insufficient, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intricately linked. The application adopts a reductive perspective, treating heritage merely as a collection of isolated and static assets, neglecting their continuous social, cultural, and spiritual significance within the community.

A notable shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practice; however, the assessment categorises them as static features. This mischaracterisation overlooks their ongoing use, meaning, and the implications of development on their surroundings, leading to an incomplete evaluation of cultural effects and disregarding their importance in community life.

Moreover, the assessment fails to include intangible cultural heritage, such as the Gaelic language and traditions, along with the long-standing relationship the community maintains with the coastal environment. These aspects are central to the area's identity but are entirely absent from the evaluation, marking a significant omission. The absence of these factors hinders a proper understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a distinct cultural identity aligned with recognised characteristics of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not reflect established principles of participation in decisions affecting cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation 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.

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not furnish a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment significantly compromises the evaluation of social impacts, health, and wellbeing associated with the proposal. Although the developer engaged local residents through focus groups and commissioned a Social Impact Assessment, the complete report remains unpublished. This lack of transparency creates a notable evidential gap, hindering both public understanding and the competent authority's ability to gauge the social risks identified by the developer's own research.

Residents are reported to be experiencing tangible levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement and are therefore based on concrete evidence rather than speculation. However, without access to the entire assessment, there is limited capacity for scrutiny of these findings, which undermines their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with “cultural loss” explicitly mentioned in the developer’s findings. Nonetheless, these critical impacts have not been sufficiently integrated into the primary application or given adequate consideration. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs tied to the development.

This lack of transparency also detrimentally affects the Environmental Impact Assessment process. For developments of this magnitude, a comprehensive understanding of social, economic, and health implications is vital, especially when the character and functioning of the community may be jeopardised. By withholding complete data, the application falls short of providing an adequate evidential basis to weigh benefits against potential harm.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Development projects are expected to facilitate positive health outcomes and mitigate harm; however, the existing evidence suggests adverse effects that have not been fully revealed. In the absence of the complete assessment, the application cannot affirm compliance with this policy.

The procedural implications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application, failing to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped character. This development would create a dominant industrial presence that would fundamentally alter the area's existing character, resulting in a permanent transformation of the landscape that cannot be mitigated.

The assessment of seascape, landscape, and visual impacts is significantly deficient, failing to adequately convey the scale of visual change anticipated. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and coastal locations frequently used by the public. This alteration would directly impact visual amenity and diminish the natural qualities that define the area. Furthermore, the assessment does not reflect the significance of these impacts in

relation to the sensitive landscape.

Methodological issues are also apparent in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This situation raises the possibility that the assessment has underestimated the magnitude of visual impact, thereby compromising its reliability.

Additionally, the assessment neglects to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context linked visually and spatially to the Atlantic horizon. The current assessment treats these sites as isolated entities, failing to acknowledge their interdependence and thereby resulting in an incomplete evaluation of the impacts on their cultural significance.

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

From a policy standpoint, the proposed development conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of change presented is incompatible with the necessary safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment weakens any assertions of compliance with policy guidelines.

The impacts identified are clearly not capable of effective mitigation. Due to the height, scale, and proximity of the turbines, their presence would be unavoidable and dominant. Thus, the resulting change to the landscape is not merely significant; it is fundamental and permanent.

In conclusion, the assessment fails to accurately represent the scale of impact, the environmental sensitivity, and the interrelated nature of landscape and heritage. These deficiencies inhibit a reliable evaluation and affirm that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks related to this proposal is fundamentally inadequate. The project involves significant seabed preparation and installation work within the challenging conditions of a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on vague mitigation and contingency measures that are to be developed after

consent, making it impossible to evaluate their adequacy or effectiveness meaningfully.

This lack of clarity regarding future measures is particularly alarming in light of the sensitivity of the West Lewis coastline, which is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks, including sediment mobilisation and accidental chemical or oil spills, it fails to offer enough detail on how these risks will be mitigated, controlled, or monitored.

Furthermore, there is considerable uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Without thorough modelling and clearly defined management strategies, assessing the extent, duration, or ecological impact of these issues is not feasible. This uncertainty also raises concerns regarding potential effects on already sensitive marine species and habitats identified in broader assessments.

Adding to these worries is the absence of detailed emergency response procedures. By postponing the development of contingency plans until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution incidents. This approach introduces procedural risks and compromises the ability of the competent authority to review environmental protection measures at the time of determination.

From a regulatory standpoint, this deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and proposed mitigations are assessed before consent is granted. Without such information, a lawful determination is unattainable. Additionally, the application does not demonstrate compliance with policy requirements associated with environmental protection and water quality.

In summary, the lack of specified mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment seriously deficient. These issues hinder a thorough evaluation of construction and pollution risks and reinforce 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. Despite this, the application does not adequately address the potential ecological or socio-economic impacts, failing to ensure that these vital uses and habitats can be protected without significant disruption. A major concern is the unsubstantiated assumption that fishing activities can be displaced without negative consequences. The application lacks evidence to confirm that alternative fishing grounds are available and capable of supporting the increased pressure that such displacement would cause. This oversight is critical, as it raises the

risk of overfishing in other areas and may lead to broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life across considerable distances, notably affecting species like dolphins. The potential disruption to a significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these risks, lacking the necessary supporting evidence to justify such minimisation.

There is also a troubling inconsistency within the application, as it acknowledges the need for licenses to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not adequately consider the cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 or the National Marine Plan. It does not show that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, making it impossible to conclude that the proposal embodies 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 obstruct a robust evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Significant ecological risks arise from the proposed works, particularly due to excavation in areas of deep peat on Barvas Moor, which is both a vital carbon store and an ecologically sensitive area. The application does not adequately address or assess

these impacts, leading to an incomplete picture of the project's overall environmental footprint. Additionally, sensitive habitats, such as machair systems and peatland environments, are protected under policy, yet the application does not show that impacts on these areas have been thoroughly evaluated or that suitable avoidance measures are in place, resulting in a notable gap in evidence regarding biodiversity protection.

The proposal further raises alarm over carbon balance. Disturbing peatland has the potential to release stored carbon, thus creating a carbon debt that undermines the objectives of renewable energy initiatives. The application inadequately tackles this issue, failing to demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights, as the application does not provide evidence of having initiated the necessary consents or processes. This absence raises concerns about the feasibility and legality of the project's implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding nocturnal wildlife and dark skies represents a significant and material gap in the Environmental Impact Assessment. The West Lewis coastline, known for its exceptionally dark skies, plays a vital role in shaping the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting, which would create a pervasive and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. Given the critical importance of dark skies to the local identity and the emerging sector of astro-tourism, this omission is particularly concerning. The oversight leads to a significant gap in understanding the landscape and environmental implications of the proposal.

More alarmingly, there has been no consideration of the impacts on nocturnal wildlife. Specific species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and

increase the risk of collision. The application lacks any lighting impact assessment or phototaxis study, resulting in an inability to assess how the proposed aviation lighting may adversely affect these species or contribute to mortality rates.

This lack of evaluation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to adequately capture nocturnal activity and associated risks. Species such as Kittiwakes, which may forage or migrate at night, also face the risk of disorientation from artificial lighting, yet this aspect has not been evaluated. The absence of site-specific night-time data leaves 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 would face adverse effects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions contravene the principles set out in National Planning Framework 4 regarding the protection of natural environments and maintaining environmental quality. Furthermore, they compromise the wider assessment of landscape and seascape impacts, given that the night-time character is an integral aspect of the environment.

In conclusion, the lack of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of sustaining a lawful determination.

TOURISM

The Isle of Lewis tourism sector, which has seen growth from £65 million in 2017 to over £81.5 million, is critical to the local economy, supporting more than 1,000 jobs and representing up to 16% of the island's economy. The application under review does not adequately assess the economic and social impacts that could arise from large-scale offshore infrastructure development, which could threaten this vital sector. Despite recognising that 86% of visitors are attracted by the area's stunning scenery, the assessment does not quantify how this proposed industrialisation would affect visitor numbers, their behaviour, or the overall economic contribution of tourism.

Additionally, the assessment neglects to evaluate how the environmental quality crucial to tourism, such as unspoiled landscapes and dark skies, may be compromised. This oversight is particularly concerning given the importance of these factors for the growing fields of nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights the deficiencies in the evaluation, leaving a notable gap in understanding the potential impacts on a vital part of the local economy.

In an island community with limited economic diversification, the lack of consideration for tourism impacts carries broader implications for employment, local businesses, and the sustainability of communities. Furthermore, the failure to conduct an Island Communities Impact Assessment as mandated by the Islands (Scotland) Act 2018 means that these economic vulnerabilities have not been appropriately evaluated.

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

Overall, the lack of quantification of tourism impacts, the failure to evaluate environmental factors influencing visitor behaviour, and the disregard for the island's economic dependence create a substantial evidential gap. This gap undermines any robust evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as outlined by statutory obligations, national policy, and evidential requirements. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application, despite being presented under a more robust policy framework, does not adequately address biodiversity, peatland preservation, landscape integrity, or community wellbeing.

There are notable deficiencies in the evidential basis provided for this application. Critical baseline data is lacking, and the proposal relies on an undefined design envelope along with unspecified mitigation measures. Furthermore, it omits essential impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or potential residual impacts.

Procedural shortcomings also characterise this application. The absence of a compliant Island Communities Impact Assessment is a violation of the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to provide a comprehensive Social Impact Assessment constitutes a significant omission. These gaps inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for consideration.

Furthermore, the proposal directly contradicts the principles laid out in National Planning Framework 4. It does not adequately protect biodiversity, natural landscapes, or cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The lack of tourism impact modelling fails to provide evidence of any net

economic benefit, and the cumulative effects of both offshore and onshore components have not been sufficiently assessed, obscuring impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent, failing to meet the evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt. This engages the precautionary principle and complicates the ability to lawfully conclude that the impacts are acceptable.

The proposed development would also lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruptions to cultural and visual relationships will cause permanent effects that cannot be mitigated satisfactorily.

Considering these factors collectively, the application emerges as both procedurally and substantively unfit for determination. The combination of information deficiencies, policy contradictions, and unresolved environmental risks obstructs the ability to make a lawful, evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

The proposal for the creation, duration and death of this infrastructure provide an opportunity for tragedy on a totally unnecessary scale. The creation will be devastating for all current inhabitants and likely prevent them from any aspect of creation of their species. The duration will exacerbate the loss of the natural environment and all that should be living and creating in this space. The 'death' has not been addressed and, as such, this infrastructure will become a permanent blight in an area of outstanding natural beauty whilst simultaneously destroying the existing way of life for all current inhabitants of land and sea. It will become 'trash'. In this sense, the company involved, are trashing a landscape and way of life in which they have no stake. This is corporate fly tipping in extremis.

Obviously they really don't care. However the current inhabitants care deeply - this is their life! For the company, it's only money.

Nobody, except the corporate entity benefits from this.

Let them go fly tip in their own backyard.

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: 4C5F3836

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not deliver a full, transparent, or dependable account of the potential environmental effects associated with the proposal. The flexible Project Design Envelope employed in the application, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, hindering both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Furthermore, the application is predominantly dependent on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any substantial evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable, contradicting the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

Additionally, there are significant evidential gaps, including deficiencies in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the magnitude and significance of impacts, especially in cases where negligible or non-significant effects are presented without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to demonstrate adherence to National Planning Framework 4, including stipulations regarding biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or appropriate safeguards implemented.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects, leaving the competent authority unable to make a determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives presented in the application is materially inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic

alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative approach does not adequately show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

There is a notable lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the developer has not convincingly demonstrated that the possibility of placing turbines further offshore has been seriously considered, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, along with the crucial role that proximity to shore plays in determining impact, highlights the significance of the missing analysis, which prevents any conclusion regarding whether the proposed siting is indeed the least damaging option.

These deficiencies extend to the evaluation of cable routing and landfall, where insufficient evidence is presented to show that alternative routes have been properly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis suggests that mitigation by design has not been effectively applied, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a significant failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a rigorous assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, leading to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

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 assessment related to cultural heritage and community identity is deeply flawed, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The application adopts an overly simplistic perspective, treating heritage as a set of isolated, unchanging assets instead of recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is the handling of culturally significant sites, including the

cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are characterised as static elements, disregarding their continued usage, meaning, and the potential impacts of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance in community life.

Intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment, is also ignored in the assessment. These elements are vital to the area's identity but are entirely omitted, indicating a significant gap in understanding the cultural impact of the development.

There are additional concerns related to community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity recognised as having characteristics of an Indigenous People, 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 of participation in decisions affecting cultural and environmental matters.

Moreover, a critical procedural flaw exists in the failure to produce a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to legally evaluate the social, cultural, and economic effects on the island community. This omission is sufficient to render the determination unlawful.

From a policy standpoint, these shortcomings conflict with the National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a clear deviation from policy stipulations.

In conclusion, the combined failure to evaluate living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application fails to provide a robust basis for understanding the true cultural cost involved.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon and an undeveloped character that contributes to a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and dominant industrial presence, fundamentally altering this character and causing a permanent and irreversible transformation of the landscape.

The application does not sufficiently represent the magnitude of the visual change that would occur. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and widely used coastal locations. This

situation would directly impact visual amenity and erode the defining qualities of naturalness and remoteness. The assessment fails to effectively convey the significance of these impacts in the context of such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

Furthermore, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape setting by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated assets rather than recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This signifies not just a visual impact but also a broader cultural and spatial harm that has not been adequately considered within the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The evaluation of potential environmental impacts linked to construction and pollution is insufficient and lacks the necessary detail for a thorough assessment. The proposed project entails significant seabed preparation and installation activities within a

challenging Atlantic setting. However, the application fails to present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are set to be developed after consent, which hinders any meaningful appraisal of their potential effectiveness or adequacy.

The reliance on undefined future actions is especially troubling considering the delicate nature of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to contamination and sediment disruption. Although the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not adequately outline strategies for their prevention, control, or monitoring.

There is also ambiguity concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management approaches, it is impossible to gauge the ecological effects, duration, or extent of these impacts. This uncertainty extends to marine species and habitats deemed sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. The decision to delay contingency planning until after consent is granted obstructs the evaluation of whether suitable protections are in place to handle pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to scrutinise environmental protection measures at the critical point of determination.

From a regulatory standpoint, postponing essential environmental safeguards contradicts the requirements outlined in the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be thoroughly assessed before consent is granted, and absent such information, a lawful decision cannot be reached. The application also fails to demonstrate adherence to 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 culminate in a materially deficient assessment. These inadequacies obstruct a rigorous evaluation of construction and pollution risks, further reinforcing the argument that the application remains 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.

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 proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential benchmarks. This application revisits the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current proposal emerges under a more robust policy framework that places increased emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

A thorough and reliable evidential basis for the determination of this application is not provided. There exist critical gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Additionally, there is a significant omission of crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering a

full understanding of likely significant effects and residual impacts.

Furthermore, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment further represents a material omission. These shortcomings inhibit the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would bring about considerable and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual relationships, and the impacts on tourism signify permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

As a young islander born and raised, and earning my livelihood directly through tourism, I am deeply concerned about various impacts this project would have. Also concerning is the extremely short lifespan of these turbines compared to the devastating impact they would have on our already fragile island community and environment, as well as how little benefit they would provide to the islands directly impacted. There is no real proposition of what will happen to the useless turbines after they have outlived their

short lifespan - will they just remain in place, scarring and rotting our amazing natural environment? The idea that wind energy via turbines such as this is better for the environment is laughable when you actually look at the cost/benefit analysis of the total process, including sourcing of all the materials required for construction, and disposing of the used turbines after. It is outrageous that every aspect of this project - from the ownership, to the non-local workers who will be constructing the turbines, to the energy eventually generated - will not be benefitting the locals or the islands which they are affecting. There are so many negatives to this outrageous proposal and so very few, if any, positives, other than to the international companies making a lot of money to exploit our land and sea, that it is truly shocking this project has gained any traction whatsoever. Our politicians and decision makers are plunging us all over a cliff chasing after a ludicrous pipe-dream notion of "net zero". They have completely pulled the wool over the eyes of the public, and our precious islands are the unwilling sacrificial lambs for them to gain money and influence in this current 'trend'. Our islands and communities are being pillaged for the falsified and over-sold benefits to others who are not affected by the dire consequences of these actions.

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: F127A877

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documents has revealed significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. This development is positioned off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The scale and design of this proposal, combined with its proximity to the shoreline, raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful decision. There is critical environmental data that is absent, baseline information that is inconsistent and limited, and numerous key aspects of the proposal that remain undefined. The flexible design framework employed inhibits a clear assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by solid evidence.

There are evident and serious policy conflicts present in the proposal. It appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and weaken the capacity of the competent authority to determine the development's acceptability within policy frameworks.

The unprecedented scale of this proposal, with large turbines situated in close proximity to the shore, raises significant concerns regarding landscape capacity, visual dominance, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and unfit for lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is 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 proposed application fails to adequately assess alternatives, resulting in a significant shortcoming in meeting the statutory requirements outlined in the

Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, the application presents a narrative describing the evolution of the project. This approach does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a notable lack of transparency and evidence regarding the comparison of alternative offshore locations, development scales, or design configurations. In particular, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore when evaluating impact, makes this absence of analysis particularly significant. Therefore, it cannot be concluded that the proposed siting represents the least damaging option.

These deficiencies also encompass the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately examined to prevent or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis imply that mitigation by design has not been implemented, resulting in reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a thorough alternatives assessment, it is not possible to determine that the proposal is sustainable or complies with relevant policies.

From a policy perspective, this deficiency undermines compliance with 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 constitutes a material omission that ultimately leads to the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a full and dependable understanding of ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data is incomplete. The methodologies used do not sufficiently capture species presence, behaviour, and habitat use, leading to a lack of sound evidence for evaluating impacts.

One significant gap involves otters, which are a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. Consequently, the assessment does not consider their core foraging range or behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been properly evaluated, undermining claims regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks shows further deficiencies. The reliance on aerial surveys creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly compared to established land-based observations that indicate these waters are frequently used. Not incorporating or properly considering such data contributes to an incomplete baseline and diminishes the reliability of the conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This uncertainty casts doubt on the actual risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been correctly identified or assessed. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall finding that the application lacks a robust 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 application inadequately addresses the assessment of cultural heritage and community identity, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply intertwined. It adopts a simplistic view, treating heritage merely as isolated, static assets and failing to acknowledge their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of important cultural sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices; however, they are categorised in the assessment as static features, overlooking their continued use and meaning, as well as the potential impact

of development on their surroundings. This misrepresentation leads to an incomplete evaluation of cultural effects and neglects their vital role in community life.

Moreover, the assessment falls short by not considering intangible cultural heritage, which includes the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are crucial to the area's identity and are entirely omitted from the assessment, marking a significant lapse. Without addressing these aspects, the cultural implications of the development cannot be accurately understood.

There are additional issues related to community rights and engagement. The Gaelic-speaking population has a distinct cultural identity characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement diminishes the validity of the assessment and fails to comply with established principles regarding participation in decisions that affect cultural and environmental matters.

A notable procedural failure is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission means that the competent authority cannot meet its legal obligation to assess 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 National Planning Framework 4, especially concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy requirements.

Overall, the absence of a thorough assessment of living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a sufficient basis for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents are already feeling the weight of this proposal, experiencing measurable stress, anxiety, and concern due to its scale and proximity. These effects are grounded in direct engagement, thereby reinforcing their legitimacy. Yet, without access to the

full assessment, the findings remain shrouded in ambiguity, obstructing proper scrutiny and the evaluation of their significance in the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines close to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and a significant sense of remoteness. The introduction of such industrial structures would create a continuous presence that fundamentally changes the landscape, leading to a permanent and irreversible transformation.

The application does not sufficiently represent the extent of the visual change associated with this proposal. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic sites, and popular coastal locations. This situation would adversely affect visual amenity and undermine the qualities of naturalness and remoteness that define the area. The assessment fails to convey the true level of impact or its significance within this sensitive landscape.

Concerns also arise from the methodology used to select and present visual viewpoints. There is evidence suggesting that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding important cultural heritage sites and high-value landscapes. This shortcoming raises the risk that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked visually and spatially to the Atlantic horizon. The evaluation treats these sites as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 in terms of protecting natural places and historic assets. The extent of the proposed change is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment undermines any claims of compliance with policy requirements.

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is fundamentally lacking, failing to provide the necessary detail to evaluate the potential environmental impacts adequately. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that would only be developed after consent, which precludes any thorough evaluation of their effectiveness or adequacy.

This dependence on unspecified future measures raises serious concerns, particularly given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not offer adequate detail on how these issues will be prevented, controlled, or monitored.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether suitable safeguards are in place to respond to pollution incidents. This approach introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant likely effects and mitigations must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Moreover, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a concerning inadequacy in the assessment of fisheries and marine life, failing to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate that these vital uses and habitats can be preserved without significant disruption.

One of the major concerns is the flawed assumption that fishing activity can be displaced without repercussions. The absence of evidence supporting the availability, accessibility, or capability of alternative fishing grounds to handle increased pressure is notable. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. Without a

solid, evidence-based assessment, it remains impossible to accurately gauge the impacts on fisheries and the livelihoods that depend on them.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to disturb a wide area, potentially affecting species such as dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious red flags, yet the application downplays these concerns without adequate supporting evidence.

There is a glaring inconsistency in the application where the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously, the impacts are described as negligible. This contradiction casts doubt on the credibility of the assessment and raises serious compliance issues with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Lacking a thorough evaluation of these combined effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby precluding any conclusion that the proposal can be considered sustainable development.

Overall, the deficiencies in demonstrating evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application result in an incomplete and unreliable assessment. These shortcomings obstruct a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application under consideration exhibits significant shortcomings in its assessment of onshore infrastructure, which is essential to understanding the overall impact of the integrated project. The separation of offshore turbines and onshore works leads to an incomplete evaluation, obscuring the true extent of environmental and socio-economic repercussions. The onshore components encompass cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which serves as a crucial carbon store and ecologically delicate habitat. The absence of a thorough assessment regarding these impacts prevents an accurate understanding of the project's total environmental footprint.

Moreover, the failure to properly assess onshore impacts inhibits a comprehensive evaluation of cumulative effects. The Environmental Impact Assessment process mandates the consideration of all project components in unison; however, the existing separation of onshore and offshore elements results in an insufficient understanding of their collective impacts on peatlands, habitats, and local communities. There are notable risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application lacks evidence that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, creating a significant evidential void concerning biodiversity protection.

Further concerns arise regarding the carbon balance associated with this proposal. Disturbances to peatland may release stored carbon, thereby potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is advantageous. Additionally, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no substantiation that the requisite consents or processes have been initiated, which raises serious concerns regarding the deliverability and legality of implementation.

From a policy standpoint, the disjointed assessment of the project and the lack of demonstrated protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. The inability to show that potential impacts can be avoided or mitigated further diminishes the credibility of the application. Collectively, the fragmented approach to project components, the absence of comprehensive assessment, and the lack of evidential support for environmental and land use impacts render this portion of the application incomplete and unreliable, hindering lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive “wall of light” effect across the western horizon. This alteration fundamentally changes the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the identity of the area and the potential for emerging tourism sectors, such as astro-tourism, this omission in the Environmental Impact Assessment is particularly concerning.

Moreover, the absence of an evaluation of impacts on nocturnal wildlife is critical. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, resulting in a failure to evaluate how aviation lighting could adversely affect these species and potentially increase their mortality rates.

This lack of assessment is exacerbated by the reliance on daytime survey data in the ornithological evaluation, which overlooks nocturnal activity and associated risks. For instance, Kittiwakes may forage or migrate at night and are also susceptible to disorientation from artificial lighting; however, this risk has not been addressed. The failure to provide site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposed development.

Without a proper 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, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the broader evaluation of landscape and seascape impacts, given that the character of night-time environments is a vital aspect of the overall ecosystem.

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

TOURISM

The proposed development brings serious concerns regarding its impacts on tourism, a vital component of the Isle of Lewis economy. With tourism being fundamentally reliant on the area's wild coastline, near-pristine landscape, dark skies, and the overall sense of remoteness, any industrialisation of the seascape may jeopardise this crucial sector. Although the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide any quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the economic contribution of tourism.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application lacks a model that considers how potential degradation of environmental quality may impact Tourism Gross Value Added and the broader economic resilience of the community. Without this essential analysis, it remains unclear if the development would create a net economic benefit or threaten an established and flourishing sector.

Furthermore, the assessment neglects the critical role of environmental quality in sustaining tourism, such as the need for unspoiled landscapes and dark skies, which enhance the visitor experience and cater to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further

exacerbates this issue, leaving a substantial void in understanding how the proposal could affect this recognised and growing segment of the local economy.

In a context where economic diversification is limited for this island community, the lack of a thorough assessment of tourism impacts raises significant concerns regarding employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, contrary to the requirements of 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 obligation to prove net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic implications of the proposal.

Collectively, the inadequacies in quantifying tourism impacts, assessing environmental factors influencing visitor behaviour, and recognising the island's economic dependencies result in a significant evidential gap. This deficiency obstructs a thorough evaluation of the economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious shortcoming in meeting the requirements for sustainable development, as judged against statutory obligations, national policy, and evidential standards. The application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This time, it is put forward under a more stringent policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Crucially, the application lacks a complete and reliable evidential basis necessary for determination. There are significant gaps in baseline data, an unspecified design envelope, and mitigation measures that are not clearly defined. Additionally, it omits vital impact pathways, including those relating to nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a full understanding of potential significant effects or residual impacts.

Moreover, there are significant procedural failings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a material 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 contravenes the National Planning Framework 4 by failing to protect biodiversity, natural areas, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it show a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would lead to significant and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism would create permanent effects that cannot be sufficiently mitigated.

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

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

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: 4968EDEE

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and associated documents, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The wind farm is proposed to be located off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the proposal centre on its scale, proximity to the shore, and design, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by strong evidence.

There are significant policy conflicts within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal presents additional concerns, with large turbines positioned very close to the shoreline, raising issues of landscape capacity, visual dominance, and environmental impact. Overall, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental repercussions of the proposal. The implementation of a flexible Project Design Envelope, which lacks firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. Such a situation undermines the assessment's integrity and results in impacts that may not accurately represent the development that will ultimately be constructed. This deficiency precludes both the public and the competent authority from grasping the true extent of the environmental effects involved.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consequently, consent is sought on the premise that any environmental harm will be addressed subsequently, hindering any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly articulated before determination.

Additionally, there are significant evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. These issues yield uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory obligations.

As a result, the application does not meet the evidential threshold stipulated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate conformity with National Planning Framework 4, especially with respect to biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly evaluated or that suitable safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of clearly defined mitigation measures, and the deficiencies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make a determination based on the information currently available.

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 ornithological assessment associated with the application exhibits significant deficiencies, marked by notable gaps in evidence and contradictions that diminish its

credibility. It is essential to recognise that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. The development's location within critical foraging areas and migratory pathways further exacerbates the issue, as the assessment does not thoroughly analyse potential displacement, collision risks, or habitat loss.

A critical inconsistency within the application arises from the developer's assertion that there will be no significant adverse effects, coupled with the pursuit of a Habitats Regulations derogation case. Such a case is only necessitated when significant harm is anticipated. This contradiction raises serious questions regarding the assessment's reliability, suggesting that the conclusions drawn are unsupported by the foundational evidence.

Furthermore, 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 feeding grounds is not comprehensively acknowledged, and the reliance on modelling techniques brings uncertainty, particularly concerning species in steep decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underreport mortality rates, particularly in the absence of complete baseline data and a full understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses substantial risks, essentially creating an obstruction in a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of ongoing mortality within this corridor or the potential ramifications for species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data inadequacies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thus precluding a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the conservation of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings inhibit a comprehensive evaluation of the impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The application takes a narrow view, treating heritage as isolated, static elements and neglecting their ongoing social, cultural, and spiritual significance within the community.

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

Moreover, the assessment neglects intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the identity of the area but are entirely missing from the evaluation, creating a significant gap. Ignoring these factors undermines the ability to fully understand the cultural impact of the proposed development.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which involved focus groups with local residents, has not been published in full, creating a significant evidential gap. This lack of transparency hinders both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research. Summaries indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and should not be regarded as speculative; however, the failure to disclose the complete assessment restricts proper scrutiny and limits the evaluation of their significance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately integrated into the main application or given due consideration. The withholding of the complete Social Impact Assessment obfuscates the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. The absence of the full dataset means that the application does not provide a complete evidential basis necessary 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. Developments must promote positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it is impossible to verify compliance with this policy.

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

In summary, the failure to disclose the full Social Impact Assessment, alongside evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding the seascape, landscape, and visual impacts is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the

environment involved. The coastline of West Lewis is characterised by its open Atlantic horizon and its undeveloped nature, offering a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would introduce an industrial presence that is continuous and overwhelming, fundamentally altering this unique character and resulting in a permanent transformation of the landscape that cannot be reversed.

Moreover, the application falls short in its representation of the visual change's magnitude. The size and proximity of the turbines would overshadow views from residential areas, historical sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to effectively communicate the level of impact or its significance within such a sensitive landscape context.

There are notable methodological concerns related to the selection and presentation of visual viewpoints. It appears that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with regard to key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which calls into question the reliability of the assessment.

Furthermore, the assessment neglects the interrelatedness of landscape, seascape, and cultural heritage. Prominent sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the broader landscape setting through visual and spatial relationships with the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these sites as separate entities, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their relationship to the natural horizon. This signifies not merely 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 stands in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The scale of the anticipated changes 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 assertion of compliance with policy.

Lastly, it is evident that the identified impacts cannot be effectively mitigated. The dominance and unavoidable nature of the turbines, given their scale, height, and proximity, render any potential for mitigation inadequate. The changes are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to adequately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail regarding the assessment of construction and pollution risks, making it impossible to properly evaluate the potential environmental effects. Significant seabed preparation and installation works are planned for a high-energy Atlantic environment; however, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is alarming. Instead, the application depends on mitigation and contingency measures that would only be prepared after consent, obstructing any meaningful assessment of their adequacy or effectiveness.

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

There remains considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is not feasible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential effects on sensitive marine species and habitats identified in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This introduces procedural risk and impairs the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated prior to consent, and the absence of such information means that a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, lack of detailed management plans, and uncertainty regarding potential impacts results in a materially

deficient assessment. These failings hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem as well as an active fishing industry. However, the assessment of fisheries and marine life within the application is inadequate, failing to provide a thorough evaluation of both ecological and socio-economic impacts. There is a concerning assumption present in the application that fishing activity can simply be displaced without any repercussions. No evidence has been offered to suggest that alternative fishing grounds exist that would be accessible and capable of accommodating any additional pressure. This lack of information is critical, as such displacement poses risks of overfishing in other areas and can have wider economic ramifications for the local fishing fleet. Without a detailed and evidence-based assessment, the potential impacts on fisheries and the livelihoods of those dependent on them remain poorly understood.

Furthermore, there are significant risks posed to marine species, particularly due to the underwater noise anticipated during construction. The use of high-energy hammer piling over an extended duration is likely to disturb marine life across large distances, affecting species including dolphins. The predicted disturbance to a considerable portion of the local bottlenose dolphin population raises serious concerns; however, the application seems to downplay these potential effects without providing adequate supporting evidence.

The application displays a notable inconsistency, acknowledging the need for licences to permit harm to European Protected Species while simultaneously categorising these impacts as negligible. Such contradictions undermine the credibility of the assessment and raise serious questions regarding compliance with the Habitats Regulations, particularly when harm is expected to occur at a level that requires legal authorisation.

Additionally, the assessment neglects to take into account cumulative impacts that stem from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately gauged.

From a policy standpoint, the proposal does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to provide evidence that the development can coexist with current marine users or that it can avoid unacceptable impacts on marine biodiversity, thus precluding any conclusion regarding its status as sustainable development.

Overall, the shortcomings in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These inadequacies obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the offshore turbines and onshore works is fundamentally flawed and fails to account for the full extent of impacts stemming from what constitutes a singular integrated project. The interconnected nature of these elements necessitates a comprehensive evaluation, yet the current fragmented approach obscures the overall environmental and socio-economic effects.

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure traversing sensitive landscapes. Significant excavation across areas of deep peat, notably within Barvas Moor, raises serious concerns due to the ecological sensitivity and carbon storage function of these habitats. The application lacks a thorough assessment of these impacts, which hinders an accurate understanding of the project's overall environmental footprint.

Moreover, the decision to exclude or defer the evaluation of onshore impacts obstructs an adequate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the artificial separation of offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

In addition, there are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which are safeguarded by policy protection. The current application does not illustrate that the impacts on these habitats have been thoroughly assessed, nor does it confirm that appropriate avoidance measures have been implemented, thereby highlighting a significant evidential gap in biodiversity protection.

Concerns also arise regarding the project's carbon balance, as the disturbance of peatland may release stored carbon, potentially generating a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this critical issue and fails to demonstrate that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. The application does not furnish evidence that the necessary consents or procedural steps have been initiated, raising doubts about the project's deliverability and lawful implementation.

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

In summary, the separation of project components, the lack of a comprehensive

assessment, and insufficient evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife is a significant and material omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposed development includes permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon. This change would 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. This lack of consideration is particularly concerning given the critical role of dark skies in the area's identity and the rising importance of tourism sectors like astro-tourism. The oversight leads to a clear gap in the overall landscape and environmental assessment.

Moreover, there is no examination of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting, which can result in disorientation and an increased risk of collision. The application does not include any lighting impact assessment or a phototaxis study, thereby failing to evaluate how the proposed aviation lighting may affect these species or contribute to increased mortality.

This situation is worsened by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or the risks associated with it. For example, species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting. Yet this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of the potential nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and preventing 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. It also undermines the more comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

Collectively, the lack of any assessment of dark skies and nocturnal wildlife presents a

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

TOURISM

The assessment of tourism impacts within the application is significantly lacking, failing to adequately evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. The application itself states that 86% of visitors are attracted by the scenery; however, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

The economic growth of tourism is notable, having risen from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Nevertheless, the application neglects to model the potential effects of industrialising the seascape and the resulting decline in environmental quality on Tourism Gross Value Added or the resilience of the wider economy. In the absence of this analysis, it remains unclear if the proposed development would yield a net economic benefit or detract from an established and expanding sector.

Moreover, the assessment does not account for the crucial role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experience and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the failure to evaluate 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 adequately assessed, 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. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and falls short of providing adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the combined failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a significant evidential gap. This situation inhibits a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards for sustainable development as mandated by statutory duties, national policy, and evidential benchmarks. This application mirrors the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was noted. It is now being presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential foundation necessary for a proper determination is incomplete and unreliable. Notable gaps exist in the baseline data, and the application relies on an undefined design envelope along with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. This results in an incomplete Environmental Impact Assessment, which fails to provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

The proposal is in clear conflict with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural spaces, and cultural heritage, nor does it show that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, 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 severe. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In conclusion, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with policy conflicts

and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority must refuse consent on these grounds or invoke the appropriate regulatory provisions to demand the submission of the missing information.

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

Additional Comments

I moved to the Island many years ago, for its traditional roots and its lack of corporate companies destruction. The wildlife on Lewis' shores and on the Island is a testament to the way of life. Building turbines surrounding Lewis will have disastrous effects on the sea life and wildlife that call Lewis its home. I personally have a phobia of wind turbines called anemomenophobia, building turbines here would be dangerous to my mental and physical health. It would also mean I have to relocate and my life and my children's would be ruined.

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: F7773734

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

Dear Sir/Madam

This objection is a formal stance against the Spiorad na Mara Offshore Wind Farm application, which has been submitted under marine licensing and Environmental Impact Assessment protocols. It arises from an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting numerous deficiencies across planning, environmental, cultural, and procedural aspects. Situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline and strong cultural identity, the proposed development raises serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

Fundamentally, the application is deficient in evidential support necessary for lawful determination. There is a significant lack of critical environmental data, with baseline information being both limited and inconsistent. Moreover, essential elements of the proposal are inadequately defined. The flexible design framework used undermines the ability to assess likely significant effects, while the unspecified mitigation measures render any evaluation of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidential backing.

There are notable policy conflicts that raise alarm. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not satisfactorily demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such discrepancies undermine the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the proposal's acceptability from a policy perspective.

The unprecedented scale of this proposal, with large turbines placed in close proximity to the shoreline, exacerbates concerns about landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear non-compliance with policy all indicate that the application is incomplete and unfit for lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

There are also substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The 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 West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is materially deficient, failing to provide a complete and reliable understanding of ecological receptors. The baseline data is incomplete, and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, there is no sound evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a European Protected Species. The

application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been sufficiently evaluated. Such omissions undermine any claims regarding the absence of significant effects on otters.

Similarly, the assessment of basking sharks suffers from significant deficiencies. The reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions, which is likely to lead to an underestimation of their presence. This contrasts sharply with established land-based observations indicating frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions 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 also hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This creates uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, 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 hinder a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant evidence gaps and internal contradictions that cast doubt on its conclusions. It is situated in an area of the west coast of the Isle of Lewis that is critical for internationally important seabird populations, many of which are already experiencing declines. The application does not adequately demonstrate that these species will not be adversely affected, despite their presence in key foraging areas and migratory routes. There is a lack of robust evaluation regarding displacement, collision risk, or habitat loss associated with the development.

Notably, a contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the

available evidence. Furthermore, the assessment fails to substantiate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling creates uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces another significant risk, effectively acting as a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion that would support the granting of consent. Additionally, these deficiencies demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In conclusion, the assessment's reliability is undermined by internal inconsistencies, methodological inadequacies, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements needed for a lawful decision.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a significant concern that compromises the integrity of the evaluation process. While the developer engaged local residents through focus groups as part of this assessment, the full report remains unpublished, leading to a critical evidential gap. This omission prevents both the public and the competent authority from fully grasping the social risks that have been identified in the developer's own research.

Furthermore, existing evidence reveals that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are directly linked to community engagement and are therefore substantiated, not speculative. The failure to disclose the complete assessment hampers proper scrutiny of these findings, thus limiting the ability to understand their significance in the decision-making process.

Additionally, there are indications that the proposal threatens community identity and cohesion, with the developer acknowledging “cultural loss” in their findings. Yet, these concerns have not been adequately incorporated into the main application nor given the attention they deserve. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning could be compromised. The failure to provide the complete dataset means the application lacks a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence at hand points to existing adverse effects that remain inadequately addressed. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material shortcoming within the application and a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment framework.

In summary, the decision to withhold the full Social Impact Assessment, coupled with the evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs lawful determination and underscores the conclusion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create a continuous and overwhelming industrial presence, which would fundamentally alter this character and lead to a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to adequately represent the magnitude of this visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness.

There are significant methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the

magnitude of visual impact has been understated, which undermines the reliability of the assessment. Additionally, the assessment does not adequately evaluate 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 linked by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these crucial relationships, altering the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents not only a visual impact but also a more extensive cultural and spatial harm that has not been sufficiently assessed within the application. From a policy standpoint, the proposal conflicts directly with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further diminishes any claims 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. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation measures. In conclusion, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These 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's assessment of construction and pollution risks is markedly deficient, lacking the necessary detail for a proper evaluation of likely environmental effects. The project entails significant seabed preparation and installation operations in a challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be established after consent, which undermines any meaningful assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises substantial concerns due to 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 potential contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

There remains 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 consequences of these impacts. This uncertainty also encompasses 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 exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards is in direct conflict with the Environmental Impact Assessment regime's requirements. Significant effects and mitigation strategies must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal under consideration raises significant concerns regarding the potential impact on local 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 sufficiently demonstrate that these vital habitats and uses can be preserved without considerable disruption.

One major concern lies in the assumption that fishing activities can be displaced without any negative effects. The application lacks evidence indicating the availability or accessibility of alternative fishing grounds that could adequately support the additional pressure. This is an important omission, as the risk of overfishing in other areas could have serious economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment hampers the understanding of the impacts on both fisheries and local livelihoods.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise created during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life across significant distances, including species like dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these impacts without adequate supporting evidence.

Moreover, the application contains a notable inconsistency regarding the need for

licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to a level that requires legal authorisation.

The assessment also fails to adequately consider the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall implications for marine ecosystems and socio-economic conditions remain undetermined.

From a policy standpoint, the application does not prove compliance with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, undermining any claims of sustainable development.

In summary, the significant deficiencies in the assessment—including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions—render it incomplete and unreliable. These issues prevent a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is incomplete and fails to 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 lack of assessment regarding nocturnal wildlife and dark skies represents a serious shortfall within the Environmental Impact Assessment. The West Lewis coastline, known for its exceptionally dark skies, is crucial for environmental quality, cultural identity, and tourism, particularly in emerging sectors such as astro-tourism. The introduction of permanent red aviation lighting, which would be visible over extensive distances, risks creating an intrusive "wall of light" effect that would significantly disrupt the natural night-time environment.

There is no evaluation of the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning considering the significance of dark skies to the local identity. Moreover, the assessment fails to address the implications for nocturnal wildlife, including species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are particularly vulnerable to artificial lighting due to their phototactic responses that may lead to disorientation and increased collision risks. The application does not provide a lighting impact assessment or a phototaxis study, meaning the potential effects of aviation lighting on these species, along with the associated mortality risks, remain unexamined.

This critical oversight is exacerbated by an overreliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities or the risks they entail. Species such as Kittiwakes, which may forage or migrate at night, are

equally at risk of disorientation from artificial lighting, yet this has not been included in the assessment. The absence of specific data regarding night-time conditions creates a significant gap in understanding the ecological impacts involved.

Without a thorough evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude potential adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and hindering a lawful determination of the application.

From a policy standpoint, this oversight is at odds with National Planning Framework 4, which pertains to the safeguarding of natural spaces and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time environments is a fundamental component of the broader ecological context.

In summary, the absence of assessments concerning dark skies and nocturnal wildlife creates a substantial evidential void. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient for supporting a lawful determination.

TOURISM

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

Tourism on the Isle of Lewis has experienced considerable growth, with revenue increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. Nonetheless, the application falls short by failing to model the potential impacts of industrialising the seascape and the resultant loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Furthermore, the assessment neglects to consider the critical role of environmental quality in enhancing the tourism experience, particularly the value of unspoiled landscapes and dark skies to visitors, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to examine the implications for tourism raises broader concerns regarding employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposed development.

Collectively, the failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependency result in a notable evidential gap. This lack of comprehensive evaluation undermines the ability to draw robust conclusions about the economic effects of the proposal and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, which highlighted unacceptable levels of industrialisation. This new application is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short of these crucial criteria.

There are critical deficiencies in the evidential basis necessary for a thorough evaluation. The application lacks comprehensive baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and overlooks significant impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. The Environmental Impact Assessment is therefore inadequate, inhibiting a complete understanding of potential significant effects or residual impacts.

Furthermore, clear procedural failings are evident. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligation under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal conflicts directly with National Planning Framework 4. It does not demonstrate protection for biodiversity, natural environments, or cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide

evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring impacts 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, in some instances, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and obstructing any lawful conclusion that impacts are acceptable.

The proposal would also 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 connections, and adverse effects on tourism are permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is procedurally and substantively unfit for determination. The significant information deficiencies, combined with conflicts with policy and unresolved environmental risks, prevent a lawful, evidence-based decision. The competent authority must either reject the consent application on these grounds or utilise the relevant regulatory provisions to request the missing information.

It is therefore 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: 42CC2400

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. The objection is grounded in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies related to planning, environmental considerations, cultural implications, and procedural adherence. The development is set to be located off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. Concerns arise regarding the scale, proximity, and design of the wind farm, which raise fundamental questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks an adequate evidential foundation for a lawful determination. Critical environmental data is absent, baseline information is both limited and inconsistent, and numerous aspects of the proposal are left undefined. The reliance on a flexible design framework obstructs a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures means that their effectiveness remains unassessed. Consequently, the documentation falls short of providing a comprehensive or informed perspective on the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by robust evidence.

Moreover, there are evident and substantive policy inconsistencies. The proposal appears to conflict 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 wellbeing. It fails to establish that national obligations to safeguard biodiversity, climate interests, and environmental integrity can be fulfilled. These inconsistencies directly challenge the statutory tests necessary for consent and jeopardise the ability of the relevant authority to determine that the development aligns with policy criteria.

The scale of the project is unprecedented for this area, with large turbines to be located in close proximity to the shoreline, which raises substantial concerns regarding landscape capacity, visual impact, and environmental ramifications. Collectively, the lack of adequate information, the reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate 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 application presents a number of serious deficiencies that collectively undermine its validity. The reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of clarity obstructs the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the Environmental Impact Assessment Report. As a result, the environmental impacts outlined may not accurately reflect those of the final development, depriving both the public and the competent authority of a proper understanding of potential environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the assumption that environmental harm will be managed later is inappropriate, as it precludes a meaningful evaluation of these measures' effectiveness or the assessment of any residual impacts. This deferral of critical information to post-consent stages contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to determination.

Significantly, there are notable evidential gaps, including a lack of comprehensive baseline data and methodological limitations, along with a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the magnitude and significance of impacts. The presentation of conclusions asserting negligible or non-significant effects without robust supporting data further obscures understanding. The lack of sufficient information hinders clarity on cumulative and worst-case impacts, introducing a level of scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity. The inability to demonstrate that impacts have been fully assessed or that appropriate safeguards exist is evident.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These critical deficiencies prevent a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The methodologies employed in assessing marine ecology and protected species are fundamentally flawed, resulting in an unreliable understanding of the ecological receptors within the West Lewis coastal environment. This area is highly sensitive and

biologically active, yet the incomplete baseline data means that the presence, behaviour, and habitat use of various species have not been adequately captured. The implications of this are significant, as it undermines the validity of the assessment in evaluating potential impacts.

A critical oversight is evident concerning otters, a European Protected Species. The application does not properly acknowledge their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment fails to consider the potential effects of construction disturbances, noise, and increased activity on these animals. Consequently, the conclusions drawn regarding the absence of significant effects on otters lack a solid evidential basis.

The assessment of basking sharks also suffers from notable deficiencies, particularly due to the reliance on aerial surveys which introduces significant detection bias in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially in light of land-based observations that indicate these waters are frequented by the species. The disregard for such pertinent data results in an incomplete baseline and undermines the reliability of the conclusions drawn.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This fosters uncertainty about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The failure to properly identify and assess protected species introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, thus rendering the granting of consent unlawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its reliability, primarily due to internal inconsistencies and methodological shortcomings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing declines, yet the application does not convincingly demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are

directly impacted by the proposed development, but the assessment fails to adequately evaluate crucial factors such as displacement, collision risk, and habitat loss.

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

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

Regulatory standards demand that evidence demonstrates no adverse effect on the integrity of protected sites, yet this application does not meet the necessary evidential threshold. The presence of contradictory conclusions, coupled with data gaps and modelling deficiencies, prevents a lawful conclusion in support of consent and engages the precautionary principle. Additionally, these deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the planning application inadequately addresses the cultural heritage and identity of the West Lewis coastline. This area is a living cultural landscape, where the environment, language, tradition, and community are interconnected. The application treats heritage as a collection of static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is seen in the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are places of active burial

and spiritual practice, yet the assessment reduces them to static features, ignoring their continued use and significance. This mischaracterisation leads to an incomplete evaluation of cultural impacts and neglects their importance in community life.

Moreover, the application does not assess intangible cultural heritage, which includes the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity, but they are missing from the assessment, which is a substantial oversight. The absence of these considerations prevents a comprehensive understanding of the cultural impact of the development.

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

Additionally, there is a procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone is enough to prevent a lawful determination.

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not adequately support an assessment of the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks adequate detail for assessing construction and pollution risks, rendering the evaluation of likely environmental effects incomplete. It involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will be prepared post-consent, hindering any meaningful assessment of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future

measures is particularly troubling. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient information on preventative, controlling, or monitoring strategies.

Further complicating matters is the uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive in the wider assessment.

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and obstructs the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures be assessed prior to consent; in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Ultimately, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts leads to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

Furthermore, the proposal poses substantial risks to marine species, particularly due

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore infrastructure assessment is materially incomplete and does not account for the full extent of impacts from what constitutes a single integrated project. The offshore turbines and the onshore works are intrinsically linked, yet they are evaluated separately, which leads to a fragmented approach that obscures the true scale of environmental and socio-economic effects. The proposed onshore components involve cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. Specifically, excavation in areas of deep peat, particularly within Barvas Moor, poses significant risks, as this region is a crucial carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

By omitting or deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be examined collectively; however,

the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities. Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not prove that these habitat impacts have been fully evaluated or that adequate avoidance measures are in place, thus highlighting a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance; the disturbance of peatland is likely to release stored carbon, potentially incurring a carbon debt that contradicts the objectives of renewable energy development. The application inadequately addresses this issue and fails to demonstrate that the overall carbon balance remains beneficial. Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights, as the application lacks evidence that the necessary consents or processes have been initiated, raising 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 conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application. Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, which ultimately prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting would create a continuous and intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

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

Additionally, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, leaving a crucial gap in understanding how aviation lighting might impact these species and their mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates the issue, as it does not account for nocturnal activity or associated risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unexamined. The lack of specific night-time data is a critical oversight in understanding ecological impacts.

Without assessing nocturnal impacts, it cannot be determined whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful decision.

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

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

TOURISM

The assessment of tourism impacts in the application is inadequate and overlooks the economic and social effects on a vital part of the Isle of Lewis economy. Tourism is heavily reliant on the island's natural features, such as its wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, there is no analysis provided to quantify how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contribution from tourism.

The economic significance of tourism is notable, with growth from £65 million in 2017 to over £81.5 million, alongside the support of more than 1,000 jobs, representing up to 16% of the island's economy. However, the application fails to forecast the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. Without this evaluation, it remains unclear if the development would yield a net economic advantage or disrupt a well-established and expanding sector.

Additionally, the assessment does not address the significance of environmental quality for tourism. This includes the crucial role of unspoiled landscapes and dark skies in enhancing visitor experiences, as well as the emerging markets of nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this oversight, leaving a critical gap in understanding the impacts on a recognised and expanding segment of the local economy.

In a community like this island, which has limited economic diversification, the neglect to assess tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means that these economic risks have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy viewpoint, the application does not meet the standards of the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It is at odds with strategic goals that recognise tourism as a priority growth area and fails to provide enough evidence for the competent authority to evaluate the economic effects of the proposal.

In conclusion, the combination of the lack of quantification of tourism impacts, the failure to assess the environmental factors influencing visitor behaviour, and the oversight of the island's economic reliance on tourism leads to a significant evidential gap. This gap hinders a thorough assessment of the economic repercussions and indicates that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to comply with the principles of sustainable development when evaluated against statutory obligations, national policies, and evidential benchmarks. It revisits the same fundamental concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This new application is put forth under a more robust policy framework that places increased emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

Moreover, the application does not furnish a comprehensive or dependable evidential basis for its assessment. There exist critical deficiencies in baseline data, reliance on an unspecified design envelope, dependence on unelaborated mitigation measures, and the exclusion of essential impact pathways. These include nocturnal wildlife, complete onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete and fails to provide a thorough understanding of significant effects or residual impacts.

There are also evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a violation of statutory duty under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment amounts to a material omission. These gaps hinder the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts the stipulations of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage, nor does it provide assurances that health and wellbeing impacts are

acceptable. Furthermore, there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, masking potential repercussions on peatlands, carbon dynamics, habitats, and crofting land.

Environmental risks are uncertain and potentially serious. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals lack completeness and are inconsistent in some aspects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion on the acceptability of impacts.

Additionally, the proposal would lead to substantial and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and impacts on tourism represent lasting effects that cannot be effectively mitigated.

In conclusion, the application is fundamentally and procedurally unfit for determination. The volume of information shortcomings, coupled with policy discrepancies and unresolved environmental risks, precludes a lawful and evidence-driven decision. The competent authority is urged to refuse consent on these grounds or to invoke the necessary regulatory provisions to obtain the outstanding information.

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

Additional Comments

Wind turbine noise pollution is a real environmental issue, (especially around cancer and “wind turbine syndrome).

1. Wind turbine noise pollution

Wind turbines create:

Aerodynamic noise – “swishing” or “whooshing” from blades moving through air

Mechanical noise – gearbox, generator, tower vibration

Low-frequency noise

Infrasound (very low frequencies, often below normal hearing range)

Sometimes rhythmic “thumping” or humming” from amplitude modulation

The “hum” people describe is often linked to low-frequency sound plus pulsed/periodic blade noise rather than a single constant tone.

Sleep disturbance is one of the strongest reported effects.

2. Effects on wildlife and natural animal life

Birds

Main concern:

collision with blades

Higher risk for:

raptors (eagles, hawks)

migratory birds

seabirds (offshore farms)

Effects include:

mortality from strikes

habitat avoidance

disrupted migration routes

Good siting (avoiding migration corridors and nesting zones) greatly reduces harm.

Bats

Bats are often more affected than birds.

Causes:

direct collision

barotrauma (rapid air pressure change near blades damaging lungs)

This is a major ecological concern.

Marine animals (offshore turbines)

Risks:

pile-driving noise during construction

underwater vibration/noise

possible effects on whales, dolphins, seals, fish

Construction noise is often a bigger issue than normal operation.

Some newer studies suggest very large offshore wind farms may create underwater aerodynamic noise that could become more important in future designs.

3. Human health effects

Strongest evidence supports:

A. Sleep disturbance

Most consistently reported effect.

Poor sleep can then contribute to:

stress

fatigue

headaches

concentration problems

mood changes

B. Noise annoyance

Annoyance is a major finding and is influenced by:

noise level

visual impact ("seeing" turbines)

personal attitude toward turbines

sensitivity to noise

stress/nocebo effects

Sometimes visual annoyance is stronger than sound itself.

C. Psychological stress

Some evidence for:

stress

anxiety

reduced wellbeing

4. Cancer risk

Current evidence:

There is strong scientific evidence that wind turbine noise causes:

cancer

tumors

leukemia

direct organ damage

Major studies found

annoyance and sleep disruption is a

cancer causation

5. "Wind Turbine Syndrome"

headaches

dizziness

nausea

tinnitus

sleep problems

anxiety

heart palpitations

ear pressure

"humming syndrome"

researchers prove symptoms result from:

sleep disruption

chronic annoyance

stress response

6. Humming syndrome

"I hear or feel a low-frequency hum constantly"

This may involve:

low-frequency environmental noise

turbine modulation

industrial noise

power lines

internal tinnitus-like perception

It is difficult to measure because low-frequency sound behaves differently and may be felt as vibration more than heard.

Supported by evidence:

✓ annoyance

- ✓ sleep disturbance
- ✓ stress
- ✓ wildlife disruption
- ✓ bird/bat mortality
- ✓ some low-frequency hum complaints
- ☒ serious light pollution

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: A36D7746

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a thorough review of the Environmental Impact Assessment Report and the associated documentation, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The proposal lacks a solid evidential foundation for a lawful determination. Essential environmental data is absent, with limited and inconsistent baseline information, and several critical aspects of the proposal remain undefined. The application employs a flexible design framework that hinders a clear understanding of the likely significant effects. Moreover, the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the impacts on the environment, culture, and community, and assertions of negligible or non-significant effects lack robust evidential support.

The application demonstrates clear policy inconsistencies. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient evidence to prove that the national obligations regarding biodiversity, climate interests, and environmental integrity will be met. These inconsistencies challenge the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises substantial concerns, with large turbines sited close to the shoreline, resulting in significant implications for landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to deliver a complete, transparent, or trustworthy account of the probable environmental effects

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

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

In addition, significant evidential deficiencies are present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including aspects related to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

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

ASSESSMENT OF ALTERNATIVES

The proposed application fails to adequately assess alternatives, resulting in a significant shortcoming in meeting the statutory requirements outlined in the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, the application presents a narrative describing the evolution of the project. This approach

does not adequately demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a notable lack of transparency and evidence regarding the comparison of alternative offshore locations, development scales, or design configurations. In particular, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore when evaluating impact, makes this absence of analysis particularly significant. Therefore, it cannot be concluded that the proposed siting represents the least damaging option.

These deficiencies also encompass the assessment of cable routing and landfall, where there is insufficient evidence to suggest that alternative routes have been adequately examined to prevent or minimise impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis imply that mitigation by design has not been implemented, resulting in reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a thorough alternatives assessment, it is not possible to determine that the proposal is sustainable or complies with relevant policies.

From a policy perspective, this deficiency undermines compliance with 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 constitutes a material omission that ultimately leads to the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the application is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors within the West Lewis coastal environment. This region constitutes a highly sensitive and biologically rich marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis necessary for evaluating potential impacts.

A significant gap exists concerning otters, which are classified as a European Protected

Species. The application does not adequately acknowledge or evaluate their active utilisation of coastal regions for foraging and movement. The disregard for their core foraging range and behavioural patterns means that the potential impacts of construction-related disturbances, noise, and heightened activity remain inadequately assessed. This oversight seriously undermines any conclusions regarding the absence of significant effects on this species.

Further shortcomings are apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to include or appropriately consider such vital data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are predicated on assumptions rather than robust evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty casts doubt on the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been identified or assessed in a thorough manner. The introduced uncertainties prevent the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its compliance with the evidential requirements for assessing impacts on biodiversity, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis. These populations are already in decline, and the application fails to demonstrate, to the necessary evidential standard, that these species will remain unaffected. The development is situated within critical foraging areas and migratory pathways, yet the assessment inadequately evaluates potential risks associated with displacement, collision, and habitat loss.

Furthermore, the conclusions drawn by the developer are fundamentally contradictory.

While asserting that no significant adverse effects will occur, the application simultaneously puts forward a Habitats Regulations derogation case, which is only required if significant harm is anticipated. This inconsistency undermines the reliability of the ornithological assessment, indicating that the conclusions are not sufficiently supported by the evidence presented.

The assessment falls short in providing adequate evidence regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is not thoroughly considered, and the reliance on modelling techniques raises uncertainties, especially for species that are in severe decline, like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

The siting of the proposed turbines within a recognised migratory corridor presents an additional significant risk, effectively acting as a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently analyse the long-term consequences of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application demonstrates a critical lack of understanding regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity and characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This failure to engage meaningfully with the community undermines the validity of the assessment and does not align with established principles that emphasise participation in matters affecting cultural and environmental interests.

Moreover, the assessment neglects the significance of intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These vital elements are essential to the area's identity but are glaringly absent from the evaluation, leading to a substantial oversight. The cultural impact of the development cannot be comprehensively understood without addressing these factors.

The examination of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than appreciating heritage as an active, living component of the community, the application adopts a narrow view, treating it as isolated and static assets.

Key deficiencies arise in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they are categorised as static features in the assessment. This mischaracterisation ignores their ongoing use and meaning, as well as the development's impact on their setting, resulting in an incomplete evaluation of cultural effects and a disregard for their significance within community life.

A significant procedural failing is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

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

In summary, the application's inability to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the proposed development remain improperly evaluated, and the application falls short of providing a sufficient basis for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been made fully available. This lack of transparency represents a significant evidential gap that hinders public understanding and prevents the competent authority from evaluating the full extent of social risks identified through the developer's own research. Available summaries indicate that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct engagement

and therefore cannot be regarded as speculative. However, the failure to publish the complete assessment stifles proper scrutiny of the findings and limits the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Despite this serious concern, these impacts have not been adequately integrated into the main application or given appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This absence of transparency undermines the entire Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this scale, especially when community character and functioning may be compromised. By failing to provide the complete dataset, the application lacks a solid evidential basis for evaluating the balance between benefits and harms.

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

The procedural implications are significant. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This material omission represents a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing negative impacts renders the evaluation incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application does not rest on sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning the seascape, landscape, and visual impacts associated with the proposal is significantly lacking and does not sufficiently reflect the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. Introducing large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to accurately depict the magnitude of the visual changes that would occur. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, thereby

directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or represent worst-case scenarios, especially in relation to important cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated, thereby compromising the assessment's reliability.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment treats these as isolated assets and does not recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This constitutes not just a visual impact, but also a broader cultural and spatial harm that has not been adequately evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The extent of change is at odds with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further 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 dominant and inescapable. Consequently, the change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

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

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 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 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 omission of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a critical gap. The West Lewis coastline boasts exceptionally dark skies, which are integral to its environmental quality, cultural identity, and tourism value. The proposed installation of permanent red aviation lighting, visible over long distances, would create a persistent and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Significantly, the impact of this lighting on visual amenity, landscape character, and the

experiences of residents and visitors has not been evaluated. This is particularly concerning given the importance of dark skies to the area's identity and the burgeoning tourism sectors, such as astro-tourism. The failure to consider these factors results in an evident gap in the overall landscape and environmental assessment.

More alarmingly, there has been no evaluation regarding the impacts on nocturnal wildlife. Species including 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 collision risks. The application lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or potentially increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which neglects to account for nocturnal activity and related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, a risk that has yet to be assessed. The absence of site-specific night-time data creates a crucial deficit in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The necessary standard of evidence to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus engaging the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission conflicts with National Planning Framework 4 regarding the protection of natural spaces and environmental quality. It also undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an essential aspect of the environment.

Collectively, the absence of assessments concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The assessment concerning tourism impacts associated with the proposed development is critically inadequate and neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are essential to tourism, which has experienced notable growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Although the application indicates that 86% of visitors are attracted by the scenery, it lacks a quantified assessment of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or overall economic

contributions.

Furthermore, the application does not analyse how the industrialisation of the seascape and the deterioration of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without this crucial analysis, it remains unclear whether the proposed development would bring about a net economic benefit or threaten an established and growing sector. The failure to take into account the significance of environmental quality in supporting tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and the growth of nature-based and astro-tourism markets, exacerbates this issue. Additionally, the lack of a Dark Skies Assessment results in a significant gap in understanding the impacts on a recognised and expanding aspect of the local economy.

In an island community characterised by limited economic diversification, the omission of tourism impact assessments has far-reaching implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as required by the Islands (Scotland) Act 2018. From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to evaluate the economic consequences of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic dependency of the island create a substantial evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the 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

In Scotland, we already generate more electricity than we can possibly use. Locals are being scammed with outrageously high bills when we have a huge amount of surplus energy already.

There for, the proposal doesn't make sense. There is no logical purpose to this proposal, other than generating disgustingly large sums of money that will only benefit wealthy corporations and creating even more mental, physical and financial suffering for all those who live here, in a time when stresses, mental health crisis and and cost of living is at an all time high.

Our Earth is already suffering from the greed of these mega wealthy corporations and humanity has an obligation to protect our nature and wildlife, seeing as our “leaders” seem to be hell bent on creating suffering for all the beings on this planet. At such a critical point in humanity, it would be a monumental disgrace to inflict more damage to healthy ecosystems and would lead us down a path that cannot be undone.

It is our duty to do what we can to stop this from going ahead, the damage done to the animals of this land will be on such a large scale. This would be truly devastating.

This all very much puts me in mind of the highland clearances and the heartbreaking story of the Black Hills, Standing Rock of the Native American people. These stories are to be learned from so we are not doomed to repeat it.

When will we finally decide to learn from history, and do better. For the earth, for all its inhabitants.

As a collective, it is our duty to care for our home before it's too late.

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: BDE5506E

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

Dear Sir/Madam

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

The application does not present a sufficient evidential basis for a lawful decision. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The employment of a flexible design framework hinders a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures prevents an assessment of their efficacy. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There exist pronounced and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

Moreover, the proposal's scale is unprecedented for this area, with large turbines located in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot substantiate a lawful determination. In light of these issues, the precautionary principle must be invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely lacking, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. Rather than recognising heritage as a living, dynamic element, the application simplifies it into isolated, static assets. This flawed perspective neglects the ongoing social, cultural, and spiritual significance of these elements within the community.

Particularly alarming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely historical markers; they are active locations for burial and spiritual practices. The assessment reduces them to static features, ignoring their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity, yet they are entirely absent from the evaluation, representing a significant gap. Without addressing these factors, the true cultural impact of the development remains obscured.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, with recognised characteristics of Indigenous Peoples, yet the application does not include a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and contravenes established principles that call for participation in decisions affecting cultural and environmental matters.

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

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, coupled with a failure to recognise living cultural practices, constitutes a clear deviation from policy mandates.

Taken as a whole, the failure to assess living heritage, intangible cultural value, community rights, and statutory duties creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately examined, and the application does not provide a sufficient foundation for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development lacks a comprehensive assessment of social impacts, health, and wellbeing, raising significant concerns regarding transparency and compliance with legal evaluation standards. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This absence of information creates a crucial evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full extent of social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts are based on direct engagement with the community and are therefore substantiated rather than speculative. However, the failure to disclose the full assessment prevents proper scrutiny of these findings and constrains the ability to assess their significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, the application has not adequately integrated these impacts or assigned them appropriate weight. By withholding the complete Social Impact Assessment, the developer 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 the social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functioning. Without access to the complete dataset, the application falls short of providing a full evidential basis for balancing potential benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, compliance with this policy is unproven.

The implications of this procedural deficiency are significant. The competent authority cannot perform a thorough socio-economic and health evaluation without the full Social Impact Assessment, representing a material omission within the application. This failure to meet evidential requirements of the Environmental Impact Assessment regime ultimately renders the assessment incomplete and unreliable. Consequently, a lawful determination cannot be made, reinforcing the conclusion that the application lacks sufficient information to be supported.

TOURISM

The proposal for large-scale offshore infrastructure significantly overlooks the assessment of tourism impacts, failing to evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism is inherently tied to the region's wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. While the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how such development would influence visitor numbers, behaviour, or the economic contribution of tourism.

Since 2017, tourism has seen considerable growth, with its value rising from £65 million to over £81.5 million. This sector now supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Despite these figures, the application fails to model the potential impact of industrialising the seascape and the associated loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such analysis, it remains impossible to ascertain whether the development would result in a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects to address the critical role of environmental quality in enhancing the tourism experience, particularly regarding the significance of unspoiled landscapes and dark skies for visitors. Emerging markets, such as nature-based tourism and astro-tourism, rely heavily on these factors. The lack of a Dark Skies Assessment exacerbates this shortfall, leaving a considerable gap in understanding the impacts on a recognised and growing part of the local economy.

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

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the obligation to illustrate net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, evaluate the environmental drivers affecting visitor behaviour, and consider the economic dependency of the island culminates in a significant evidential gap. This gap hinders a thorough evaluation of the economic effects, reinforcing the notion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal illustrates a significant failure to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application revisits the central issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was

deemed unacceptable due to the extent of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

There is an evident lack of a comprehensive and reliable evidential basis for decision-making within this application. Notable gaps exist in baseline data, the proposal relies on a vague design envelope, mitigation measures remain unspecified, and crucial impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications have not been addressed. Consequently, the Environmental Impact Assessment is incomplete and does not provide a full understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes statutory obligations as outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a significant oversight. 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.

This proposal stands in direct opposition to the National Planning Framework 4. It lacks evidence of biodiversity protection, preservation of natural environments and cultural heritage, acceptable health and wellbeing impacts, and fails to demonstrate a net economic benefit due to the absence of tourism impact analysis. The cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent with each other. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Additionally, the proposal would induce considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and adverse effects on tourism signify permanent impacts that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, coupled with policy inconsistencies and unresolved environmental risks, hinder the possibility of a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or utilise relevant regulatory provisions to demand the necessary missing information.

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

Additional Comments

This development will destroy our tourism industry, it is difficult enough to make a living here without the negative impact from this development.

The island residents did not consent to the industrialisation of our island, our local authority made a presumption without proper discussion.

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: 69D78E1A

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, rich cultural identity, and near-pristine environment. The scale and design of this application raise serious concerns regarding its adherence to statutory requirements, national policy, and sustainable development principles.

A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals that critical environmental data is missing, and baseline information is both limited and inconsistent. Key aspects of the proposal are not clearly defined, and the flexible design framework leaves uncertainty regarding potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

There are substantial policy conflicts present as well. The application 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. It does not demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and challenge the competent authority's ability to determine that the development is acceptable from a policy perspective.

Given the unprecedented scale of the proposal, with large turbines positioned close to the shoreline, there are significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy illustrates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to reliably account for the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific

turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This ambiguity compromises the integrity of the assessment, resulting in impacts that may not accurately represent the final development. Consequently, this situation prevents both the public and the competent authority from gaining a true understanding of the environmental consequences.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that are not yet clearly defined. Seeking consent on the premise that environmental harm will be mitigated at a later stage inhibits any meaningful evaluation of these measures' effectiveness or the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally unacceptable and undermines the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and necessary mitigation must be established clearly before determination.

There are significant evidential shortcomings, including gaps in baseline data and limitations in methodology, which rely on assumptions rather than site-specific evidence. This generates uncertainty surrounding 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 obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not satisfy the evidential threshold set by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be confirmed that impacts have been fully assessed or that appropriate safeguards are established.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder 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 presented in the application concerning marine ecology and protected species is inadequate and fails to offer a thorough understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise or evaluate their active utilisation of coastal regions for foraging and movement. The absence of consideration regarding their core foraging range and behavioural patterns results in an inadequate assessment of the potential effects arising from construction disturbances, noise, and increased human activity. This deficiency undermines any conclusions drawn about the absence of significant effects on this species.

The assessment of basking sharks also reveals critical shortcomings, particularly due to the reliance on aerial surveys that create significant detection bias in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The omission of relevant data and the failure to properly consider such information contribute to an incomplete baseline, thus compromising the reliability of the conclusions drawn.

These methodological shortcomings mean that conclusions asserting negligible or non-significant effects rely on assumptions rather than solid evidence. The lack of sufficient baseline data further hinders meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty surrounding the actual level of risk posed to marine species and their habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development exhibits significant deficiencies, undermining its reliability and the conclusions drawn from it. A crucial aspect of the application is the presence of contradictory findings, particularly where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. This latter case is only warranted in situations where substantial harm is anticipated, which casts doubt on the reliability of the assessment and suggests a disconnect between the conclusions and the available evidence.

The assessment fails to adequately demonstrate that seabird populations associated

with critical protected sites, such as the Lewis Peatlands and St Kilda, will not face adverse impacts. There is insufficient consideration given to the significance of key feeding grounds, and the reliance on modelling approaches introduces a level of uncertainty that is particularly concerning for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies utilised may also lead to an underestimation of mortality rates, especially given the gaps in baseline data and the incomplete understanding of species' behavioural responses.

Furthermore, the placement of turbines within a recognised migratory corridor adds another layer of risk, as it effectively acts as a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment does not sufficiently consider the long-term consequences of sustained mortality in this corridor, nor does it adequately address the potential effects on species that have relatively small global populations.

From a regulatory standpoint, the application falls short of meeting the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means that the standard of proving beyond reasonable scientific doubt has not been fulfilled. This situation engages the precautionary principle, which precludes a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets rather than recognising it as a vibrant cultural landscape where environment, language, tradition, and community intertwine. This reductive approach overlooks the ongoing social, cultural, and spiritual roles that these heritage elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, yet the assessment characterises them as static features, ignoring their continued use and the implications of development on

their context. This mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the community's deep-rooted relationship with the coastal environment. These aspects are essential to the area's identity, yet they are entirely omitted from the evaluation, representing a significant gap. Without recognising these factors, the true cultural impact of the development remains unclear.

There are additional concerns regarding community rights and the lack of engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of an Indigenous People, has not been involved in a process of Free, Prior and Informed Consent. This absence of genuine participation undermines the legitimacy of the assessment and fails to uphold established principles of inclusion in decisions affecting cultural and environmental matters.

A significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination legally deficient.

From a policy standpoint, these shortcomings position the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with living cultural practices, clearly diverges from established policy requirements.

Overall, the combined failure to evaluate living heritage, intangible cultural value, community rights, and statutory requirements creates a significant evidential gap. The cultural impacts of the development have not been appropriately assessed, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Furthermore, the proposal is viewed as a direct threat to community identity and

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding the seascape, landscape, and visual impacts presents significant deficiencies, failing to accurately depict the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, unspoiled nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would establish a continuous and overpowering industrial presence, fundamentally transforming this character and resulting in a permanent, irreversible alteration of the landscape.

The application does not sufficiently capture the magnitude of the visual changes anticipated. Given the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would have a direct adverse effect on visual amenity and undermine the essential qualities of naturalness and remoteness. Furthermore, the assessment inadequately communicates the significance of these impacts within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This situation raises concerns that the visual

impact may have been understated, thereby calling into question the reliability of the assessment.

Additionally, there is a notable lack of evaluation regarding the interconnected nature of landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities without recognising their interdependence, which results in an incomplete analysis of the impacts on their settings and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and breaking their connection to the natural horizon. This represents not merely a visual issue but a more profound cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is at odds with the requirement to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be adequately mitigated. Given the size, height, and proximity of the turbines, their presence would be inescapable and dominant. Consequently, the resultant change is fundamental and permanent, rather than something that could be diminished to an acceptable level through mitigation efforts.

Overall, the assessment fails to accurately portray the scale of impact, the environment's sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this 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 evaluation of fisheries and marine life as presented in the application is inadequate and lacks a thorough examination of ecological and socio-economic implications. The West Lewis coastal waters are home to a rich marine ecosystem and support a vibrant fishing industry. However, the application fails to prove that these vital uses and habitats can be preserved or maintained without causing significant disruption.

A major concern is the premise that fishing activities can be relocated without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or capable of accommodating the additional pressures that may arise. This gap is critical, as such displacement could lead to overfishing in other areas and may adversely affect the local fishing fleet's economic stability. Without a robust, evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to the

underwater noise generated during construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over considerable distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is troubling; nevertheless, the application diminishes the importance of these potential effects without adequate supporting evidence.

Moreover, there exists a notable contradiction within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, yet the impacts are simultaneously categorised as negligible. This inconsistency undermines the credibility of the assessment and raises doubts regarding compliance with the Habitats Regulations, especially where harm is expected to an extent that requires legal approval.

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

From a policy perspective, the application fails to show adherence to the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or avoid detrimental impacts on marine biodiversity, thereby precluding any conclusion that the proposal is sustainable.

In summary, the combination of insufficient evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies results in an assessment that is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the potential 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.

TOURISM

The application presents a materially deficient assessment of tourism impacts, failing to evaluate the economic and social consequences for a key sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged within the application that 86% of visitors are attracted by scenery; however, there is no quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced significant growth, rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this growth, the application neglects to model the potential impacts of industrialisation of the seascape and the loss of environmental quality on Tourism Gross Value Added or on the wider economic resilience of the community. Without such an analysis, it remains impossible to ascertain whether the proposed development would result in a net economic benefit or undermine an established and expanding sector.

Moreover, the assessment disregards the critical role of environmental quality in

supporting tourism, including the significance of unspoiled landscapes and dark skies for enhancing visitor experience and for emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a notable gap in the understanding of impacts on a recognised and burgeoning part of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit net benefit. Additionally, it conflicts with strategic objectives that identify tourism as a priority growth sector and falls short in providing sufficient evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency obstructs a robust 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 as outlined by statutory duties and national policy. This application presents issues similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application lacks the necessary evidential basis for determination.

Significant gaps in baseline data are present, and the application utilises an undefined design envelope. It relies on unspecified mitigation measures and omits critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are evident, particularly with the absence of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment is also a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural

identity, and economic resilience, making the application unsuitable for determination.

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

Environmental risks posed by the project are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. Therefore, it is essential that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or require the submission of the outstanding information.

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: 1813CFE1

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

Dear Sir/Madam

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The overall evaluation of social impacts, health, and wellbeing is notably inadequate and lacks the necessary transparency for a lawful assessment. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made available. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified in the developer's own research.

Summaries that are currently accessible reveal that residents are experiencing tangible levels of stress, anxiety, and concern as a result of the proposal's scale and proximity. These findings stem from direct community engagement and are therefore based on concrete evidence rather than speculation. The failure to release the full assessment limits scrutiny and restricts the capacity to evaluate the significance of these issues in the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to the community's identity and cohesion, with the term "cultural loss" arising in the developer's findings. Yet, these implications have not been adequately reflected in the primary application, nor given the appropriate consideration they warrant. Withholding the full Social Impact Assessment obscures the genuine human and social costs associated with the proposed development.

This absence of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is crucial for developments of this magnitude, especially when community character and functionality are at stake. The lack of the complete dataset means the application does not provide a thorough evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application fails to show alignment with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid detriment; however, the available evidence suggests that there are existing adverse effects that remain undisclosed. Without the full assessment, demonstrating compliance with this policy is not possible.

The procedural consequences are significant. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts due to the unavailability of the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

When taken together, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

TOURISM

The Isle of Lewis has seen significant growth in its tourism sector, with the economic contribution increasing from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application under consideration lacks a thorough assessment of tourism impacts, failing to evaluate both the economic and social consequences for this crucial sector. While it is acknowledged that 86% of visitors are attracted by the area's scenery, there is no quantified analysis regarding how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

The assessment neglects the essential role of environmental quality in sustaining tourism, particularly regarding unspoiled landscapes and dark skies, which significantly enhance the visitor experience. The omission of a Dark Skies Assessment exacerbates the shortcomings of the evaluation, leaving a substantial gap in understanding the implications for an increasingly important segment of the local economy, such as nature-based tourism and astro-tourism.

In a community that relies heavily on a limited economic base, the failure to evaluate the impacts on tourism has broader repercussions for employment, local businesses, and the sustainability of the community. Furthermore, there is an absence of a compliant Island Communities Impact Assessment, which means the economic vulnerabilities under the Islands (Scotland) Act 2018 have not been properly assessed.

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

Overall, the combination of failing to quantify tourism impacts, neglecting to assess the environmental drivers of visitor behaviour, and disregarding the island's economic dependency leads to a significant evidential gap. This situation hampers a comprehensive evaluation of the economic effects and suggests that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the requirements for sustainable development. It fails to satisfy statutory duties, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, despite being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in the baseline data, an undefined design envelope, unspecified

mitigation measures, and missing key impact pathways, including effects on nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, preventing a clear understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

There are uncertainties regarding environmental risks that could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

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

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

Additional Comments

The grotesque size of the turbines alone will discourage visitors coming to our island. We rely heavily on tourism and this will have a negative effect. During construction stage the effect on our services which are already stretched will be under immense pressure. Sufficient infrastructure hasn't been put in place. Locals are

going to suffer between, Dr's, and dentists app, travel availability to and from the island. And our emergency services will also be stretched.

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: 85001CD4

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. Concerns arise regarding the scale, proximity, and design of the project, questioning its alignment with statutory requirements, national policy, and the principles of sustainable development.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a reliable account of the potential environmental effects of the proposed project. The approach of employing a flexible Project Design Envelope, which does not commit to precise turbine sizes, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity and means that the predicted impacts may not accurately reflect the development as it will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental impacts.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that any environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of their effectiveness or assessment of residual impacts. This deferral of essential information to stages post-consent is procedurally unacceptable and runs counter to the intentions of the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly identified prior to determination.

There are also substantial evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These issues yield uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if adequate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data result in the Environmental Impact Assessment Report being both unreliable and incomplete. These flaws inhibit a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of project evolution that does not adequately demonstrate that less harmful options have been identified, evaluated, and

chosen over more damaging solutions.

There is a clear absence of transparent comparison regarding alternative offshore sites, development scales, and design configurations. The application notably does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely diminish. The West Lewis coastline's sensitivity and the importance of proximity to shore in assessing impact render this lack of analysis particularly concerning, as it prevents any conclusions that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where the evidence provided is insufficient to suggest that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors. This includes significant cultural and spiritual sites like Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been considered, leading to a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, obstructing the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency raises serious concerns regarding adherence to National Planning Framework 4, especially in terms of protecting natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their active utilisation of coastal areas 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 arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of 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 issues obstruct a thorough evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamental contradiction by asserting that there will be no significant adverse effects, while simultaneously making a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the ornithological assessment, suggesting that the conclusions reached are not backed by adequate evidence. The assessment contains significant gaps and internal inconsistencies that undermine its validity.

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 provide sufficient evidence demonstrating that these species will not be adversely affected. Key foraging areas and migratory pathways are present in the development site, yet the assessment does not effectively evaluate the potential consequences of

displacement, collision risk, or habitat loss for these birds.

The methodologies used in the assessment are likely to underestimate mortality rates, particularly for species in severe decline, such as Kittiwakes and Fulmars. There is a significant reliance on modelling approaches, which introduces uncertainty regarding the true impact on seabirds associated with protected sites, including the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully accounted for, raising further concerns about the adequacy of the analysis.

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

From a regulatory standpoint, the application fails to meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with the gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation activates the precautionary principle, which precludes a lawful conclusion in favour of consent.

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

In summary, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These flaws prevent a comprehensive evaluation of impacts and contribute to the overarching conclusion that the application does not satisfy the statutory requirements necessary for its determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is severely lacking, neglecting the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application approaches heritage in a simplistic manner, perceiving it as a collection of disconnected, unchanging assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment inaccurately categorises them as static features, overlooking their continued use, significance, and the potential impact of development on their surroundings. This misrepresentation

leads to a partial understanding of cultural effects, disregarding the essential role these sites play in community life.

Additionally, the evaluation fails to consider intangible cultural heritage elements, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the identity of the area yet are completely excluded from the assessment, marking a substantial oversight. The absence of these considerations prevents a comprehensive understanding of the cultural impact of the proposed development.

Concerns regarding community rights and engagement are also prominent. The Gaelic-speaking population embodies a unique cultural identity with traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the credibility of the assessment and does not adhere to established principles of participation concerning decisions that affect cultural and environmental interests.

Moreover, a critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is a statutory requirement as outlined in 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 renders a lawful determination impossible.

From a policy standpoint, these deficiencies place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear deviation from policy expectations.

Overall, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application falls short of providing a solid foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. A Social Impact Assessment was commissioned by the developer, which included focus groups involving local residents, yet the complete report has not been made available to the public. This omission creates a significant evidential gap, hindering both the public and the competent authority from fully understanding the social risks identified through the developer's own investigations.

Residents have expressed measurable levels of stress, anxiety, and concern related to the scale and proximity of the proposal, as evidenced by direct engagement rather than

speculation. However, the failure to disclose the comprehensive assessment limits the opportunity for proper scrutiny of these findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence indicating 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 recognition, these impacts have not been adequately integrated into the main application nor given the appropriate weight they warrant. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency directly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, particularly when community character and function may be jeopardised. The absence of the full dataset results in an application that fails to present a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. It is essential for developments to foster positive health outcomes and avert harm, yet the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it cannot be proven that the application complies with this policy.

The procedural implications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the complete Social Impact Assessment, combined with evidence of existing adverse impacts, renders the overall assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed and does not adequately account for the significant scale of change or the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposal to introduce large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application fails to represent the extent of this visual change accurately.

The large scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not sufficiently convey the significance of this impact in the context of such a sensitive landscape.

Concerns are also evident regarding the methodology used in selecting and presenting visual viewpoints. There is evidence suggesting that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, thus compromising the assessment's reliability.

Another critical deficiency is the failure to consider the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated assets instead of recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is deficient, lacking the necessary detail to evaluate potential environmental impacts adequately. The proposal entails significant seabed preparation and installation activities within the dynamic Atlantic

environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependency on unspecified future measures raises particular alarm given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to detail how these incidents will be prevented, managed, or monitored.

There remains uncertainty regarding the scale and dynamics of sediment plumes that could result from seabed disruption and cable installation. In the absence of comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are established to respond to pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts lead to an assessment that is materially inadequate. These deficiencies inhibit a thorough evaluation of construction and pollution risks and further substantiate the assertion 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure associated with this project is significantly incomplete. It fails to take into account the interconnected nature of the offshore turbines and the onshore works. This separate assessment leads to a fragmented understanding of the true environmental and socio-economic impacts of the entire project.

Onshore elements involve the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access

infrastructure through sensitive landscapes. Excavation in areas of deep peat, particularly within Barvas Moor, is particularly concerning as it is a crucial carbon store and an ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By not assessing the onshore impacts adequately, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires a comprehensive consideration of all project components, but the separation of offshore and onshore works prevents a full understanding of their combined effects on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not show that these impacts have been fully evaluated or that appropriate measures to avoid them have been put in place, highlighting a significant gap in biodiversity protection.

Additionally, the disturbance of peatland poses a risk to carbon balance as it releases stored carbon, which could create a carbon debt and contradict the aims of renewable energy development. The application falls short in addressing this critical issue and fails to demonstrate that the overall carbon balance will remain positive.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence presented that necessary consents or processes have been initiated, leading to concerns about the deliverability and legality of the proposed works.

From a policy standpoint, the failure to assess the project as a unified entity, alongside the lack of demonstrated 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 weakens the application.

Overall, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts contribute to an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible across long distances, resulting in a continuous and intrusive effect on the western horizon, fundamentally altering the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this

lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant due to the importance of dark skies to the area's identity and the growing tourism sector, including astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment regarding this lighting or a phototaxis study, thus failing to evaluate the potential effects on these species or the risk of increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment fails to capture the nocturnal activities or associated risks. Species like Kittiwakes, which might forage or migrate during the night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains uncertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not achieved, which engages the precautionary principle and obstructs lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time settings is a fundamental component of the environment.

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is significant, having grown from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, which accounts for up to 16% of the island's economy. However, the application in question fails to adequately evaluate the tourism impacts, neglecting to assess the economic and social consequences for this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's scenery, there is no quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Furthermore, the assessment overlooks the crucial role of environmental quality in sustaining tourism, particularly the appeal of unspoiled landscapes and dark skies to the visitor experience. This gap is further exacerbated by the absence of a Dark Skies Assessment, which is essential for understanding the implications for nature-based tourism and astro-tourism, both of which are emerging markets for the area.

In an island community with limited economic diversification, the neglect to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities, as mandated by the Islands (Scotland) Act 2018, have not been properly evaluated.

Moreover, from a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to show net benefits. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and considering the island's economic dependency culminate in a substantial evidential gap. This lack of thorough analysis inhibits a robust evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its failure to meet the requirements of sustainable development, which is evident when assessed against statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This new application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a reliable evidential basis for determination.

Critical gaps in baseline data are evident throughout the application. It relies on an undefined design envelope, incorporates unspecified mitigation measures, and omits key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are procedural failings that further undermine the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a significant omission. These deficiencies obstruct the competent authority's ability to assess impacts on community wellbeing,

cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, or cultural heritage. The application fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. 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 the proposal remain uncertain and could be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold necessary to exclude 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 will bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism will create permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The vast information deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct any lawful, evidence-based decision-making process. Therefore, the competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information. A formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

Please do not proceed with this unnecessary development of our pristine island.

The earth is being beat up enough, all over the planet.

Fir our future, our children's and grandchildren future, no. Just no. ^[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: A3D0FAC9

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 marine licensing and Environmental Impact Assessment regimes. The objection is rooted in an examination of the Environmental Impact Assessment Report and the associated documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. Essential environmental data is absent, baseline information is not only limited but also inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework employed fails to allow for a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unverified. Consequently, the available documentation does not afford a comprehensive understanding of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust substantiation.

There are evident and substantial conflicts with policy. The proposal seems to contradict 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 adequately demonstrate compliance with national obligations to protect biodiversity, climate concerns, and environmental integrity. These conflicts directly impact the statutory requirements for consent and compromise the ability of the competent authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of the project, with large turbines positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and does not deliver a full or transparent overview of the potential environmental impacts of the proposal. The introduction of a flexible Project Design Envelope, which lacks firm commitments to specific dimensions or configurations of turbines, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and obscures the true environmental effects, preventing both the public and the competent authority from fully grasping the implications of the development.

Moreover, the application is heavily reliant on mitigation measures, management plans, and monitoring strategies that remain undefined at this stage. Seeking consent under the assumption that potential environmental damage will be managed later is unacceptable and hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. The deferral of critical information to stages following consent contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies must be clearly established before any decision is made.

There exist substantial evidential gaps, including insufficient baseline data and methodological limitations, compounded by a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible effects are drawn without adequate supporting data. The lack of sufficient information prevents a comprehensive understanding of cumulative impacts and introduces scientific uncertainty that fails to align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This indicates a significant oversight in following the established mitigation hierarchy. Consequently, the competent authority is left without a clear understanding of whether less harmful and more suitable alternatives could be viable. The assessment of alternatives is

fundamentally inadequate and does not fulfil the statutory requirements set by the Environmental Impact Assessment regime. Instead of delivering a structured, reasoned comparison of feasible alternatives based on their environmental impacts, the application merely offers a narrative of project development. This flawed approach does not adequately illustrate that less damaging options have been effectively identified, evaluated, and preferred over more harmful solutions.

Moreover, the application provides no transparent, evidence-based comparison of different offshore locations, scales of development, or design configurations. Notably, it fails to show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, means that the lack of such analysis makes it impossible to ascertain that the proposed siting is the least damaging option available.

The shortcomings are also apparent in the evaluation of cable routing and landfall assessment, which lack sufficient evidence that alternative routes have been explored to minimise impacts on sensitive receptors. This oversight includes locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the failure to conduct comparative analysis suggest that mitigation by design has not been considered, leading to reliance on measures that would come after the design phase.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, reinforcing the overall conclusion that the application has not been sufficiently assessed and cannot support a lawful decision.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the proposal's impact on seascape, landscape, and visual aspects is insufficient and fails to adequately capture the extent of the changes and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped nature that conveys a strong sense of remoteness. The addition of large-scale turbines near the shoreline would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent transformation of the landscape.

The proposed turbines would dominate the views from residential areas, historic sites, and popular coastal locations, which would significantly affect visual amenity and detract from the naturalness and remoteness of the environment. The assessment does not effectively communicate the magnitude of this impact or its importance in the context of such a sensitive landscape.

Methodological issues are evident in the selection and presentation of visual viewpoints, as the evidence indicates that these viewpoints may not accurately

represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises concerns that the assessment has understated the visual impact, calling into question its reliability.

Additionally, the relationship between landscape, seascape, and cultural heritage has not been adequately considered. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are interconnected within the broader landscape, linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, which results in an incomplete understanding of the impact on their context and cultural significance.

The proposed industrialisation of the seascape would disrupt these interrelationships, altering how heritage assets are perceived and 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 evaluated in the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural areas and historic assets. The scale of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further questions any claims of compliance with policy.

Moreover, the identified impacts are unlikely to be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be prominent and unavoidable. Consequently, the change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

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

TOURISM

The application presents a significant shortfall in the assessment of tourism impacts, neglecting to examine the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. Although 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.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the potential

industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or broader economic resilience. This absence of analysis precludes a determination of whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment overlooks the significance of environmental quality in tourism, particularly the need for unspoiled landscapes and dark skies for an enhanced visitor experience. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a major gap in understanding the effects on a recognised and growing segment of the local economy, namely nature-based tourism and astro-tourism.

In an island community with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been addressed as stipulated by the Islands (Scotland) Act 2018.

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

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic reliance result in a considerable evidential void. This gap hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal highlights significant shortcomings in its adherence to sustainable development principles when evaluated against statutory duties, national policies, and evidential standards. This application echoes the fundamental issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, where the extent of industrialisation was deemed unacceptable. It is now being presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

Critical gaps exist in the evidence provided for consideration. The use of an undefined design envelope, unspecified reliance on mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects, undermine the application. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of significant effects or residual impacts.

The proposal also suffers from procedural inadequacies. The lack of a compliant Island

Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a notable omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In addition, the proposal contravenes 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 due to absent tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been properly evaluated, complicating the assessment of their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially severe. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also contain internal inconsistencies. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful determination that impacts are acceptable.

Additionally, the proposal would lead to substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual connections, along with impacts on tourism, would produce permanent effects that cannot be mitigated to an acceptable level.

In summary, the application presents both procedural and substantive issues that render it unfit for determination. The combination of significant information gaps, policy discrepancies, and unresolved environmental risks precludes a lawful, evidence-based decision. Therefore, it is urged that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Additional Comments

The windfarm industry promotes the falsehood of low levels of toxic pollution due to leading edge erosion. The tiny amounts quoted by industry refer to much smaller inland sited turbines with only small blade sections undergoing erosion. What is to be sited at N4 bears no relation to this and there is the potential for up to 6500kg annually of toxic particulates entering the sea. How can this be allowed in our pristine environment?

It would have been much better to have encouraged local renewable generation, at both a community level and individual household level, and provide sustainable longterm REAL jobs for LOCAL people. Currently the local community is being denied this as any new local renewable generation is being prevented due to N4.

The aberration that is N4 is totally at odds with the irreplaceable landscape of Lewis

and Harris. It disgusts me that this may come to pass. This is driving people to leave their island home as they cannot bear to witness it's creation.

It is laughable that the local council have the gall to pretend that N4 will create a tourism boom. Our sole household income from employment is derived from tourism. We fully expect this income to end once word of the impact of N4 becomes better known.

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: 401E0370

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. Our concerns stem from a thorough review of the Environmental Impact Assessment Report and supporting documentation, revealing significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural integrity. The development site is situated off the west side of the Isle of Lewis, known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise profound questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

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

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

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

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 evaluation of cultural heritage and community identity within the application is profoundly lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. Instead, the application simplifies heritage into a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment inadequately addresses the significance of sites such as the cemeteries at Dalmore, Bragar, and Barvas, which are active burial and spiritual locations. The categorisation of these sites as mere static features fails to consider their continued use and the implications of development on their surroundings. This oversight leads to an incomplete understanding of cultural effects and neglects their integral position in community life.

Moreover, the application disregards intangible cultural heritage, including the Gaelic language and traditions, alongside the community's deep-rooted connection to the coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the assessment, representing a considerable shortcoming. Without acknowledging these aspects, the cultural ramifications of the proposed development remain inadequately understood.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, identified as possessing a distinct cultural identity akin to that of an Indigenous People, has not been granted the process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the legitimacy of the assessment and contradicts established principles regarding participation in matters affecting cultural and environmental concerns.

Furthermore, a significant procedural error exists in the failure to complete a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination of the proposal unlawful.

From a policy perspective, these inadequacies position the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, as well as living cultural practices, clearly deviates from the necessary policy directives.

In conclusion, the cumulative failure to assess living heritage, intangible cultural value, community rights, and to adhere to statutory requirements creates a significant evidential void. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts, seascape, and landscape is fundamentally inadequate, failing to capture the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, a lack of development, and a strong sense of isolation. The proposed large-scale turbines situated near the shoreline would introduce a continuous industrial presence, fundamentally altering this landscape and leading to a permanent transformation of its character.

The application does not sufficiently represent the extent of visual alteration. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and representation of visual viewpoints. It appears that the selected viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact has been underestimated, thus compromising the reliability of the assessment.

Moreover, there is a notable lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment approaches these sites as isolated 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 the context in which heritage assets are perceived and severing their ties to the natural horizon. This constitutes not only a visual impact but also a more profound cultural and spatial detriment that has not been adequately examined within the application.

From a policy standpoint, the proposal contradicts the principles of National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The scale of transformation is at odds with the requirements to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a rigorous worst-case assessment further weakens the argument for compliance with policy guidelines.

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

Collectively, these issues highlight the assessment's failure to accurately portray the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. Such deficiencies hinder a reliable evaluation and further support the conclusion that the proposal is incompatible with the protection of this landscape.

TOURISM

The evaluation of tourism impacts is insufficient and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application states that 86% of visitors are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. Despite this growth, the application does not model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience. Without such analyses, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise an established and burgeoning sector.

Moreover, the assessment neglects to recognise the significance of environmental quality in fostering tourism, including the critical role of unspoiled landscapes and dark skies in enhancing visitor experiences. This lack of focus on emerging markets, such as nature-based tourism and astro-tourism, is further exacerbated by the omission of a Dark Skies Assessment, creating a notable gap in understanding the potential impacts on a recognised and expanding component of the local economy.

In an island community characterised by limited economic diversification, the disregard for tourism impacts carries broader consequences for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as stipulated under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not illustrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity of demonstrating net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to fully assess the economic implications of the proposal.

In summary, the combination of inadequate quantification of tourism impacts, neglect of environmental factors influencing visitor behaviour, and disregard for the island's economic dependence results in a substantial evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its failure to meet the requirements of sustainable development, which is evident when assessed against statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This new application, despite being submitted under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to provide a reliable evidential basis for determination.

Critical gaps in baseline data are evident throughout the application. It relies on an undefined design envelope, incorporates unspecified mitigation measures, and omits key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to facilitate a comprehensive understanding of likely significant effects or residual impacts.

Moreover, there are procedural failings that further undermine the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a significant omission. These deficiencies obstruct the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, or cultural heritage. The application fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. 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 the proposal remain uncertain and could be significantly detrimental. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in places. The evidential threshold necessary to exclude 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 will bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism will create permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination.

The vast information deficiencies, combined with conflicts with policy and unresolved environmental risks, obstruct any lawful, evidence-based decision-making process. Therefore, the competent authority must either refuse consent based on these grounds or invoke the relevant regulatory provisions to demand the submission of the missing information. A formal request is made for the refusal of the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

As a frequent visitor to Lewis,
This would cripple the tourist trade, just when tourism seems to be flourishing. A definite no no in my book. It would probably make me just stay more south. ie South uist

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: 56E860F2

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

Dear Sir/Madam

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

A review of the Environmental Impact Assessment Report and supporting documentation reveals critical deficiencies. The application lacks an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is both limited and inconsistent, and significant aspects of the proposal remain undefined. The use of a flexible design framework further complicates the ability to assess likely significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are substantive policy conflicts associated with the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests for consent and impair the ability of the competent authority to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and inadequate for supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and undermine its reliability, as it fails to provide a full and transparent account of the potential environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty hinders the application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately reflect the actual development constructed, limiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed subsequently, which obstructs meaningful evaluation of the effectiveness of these measures and precludes proper assessment of residual impacts. Such deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established before any determination is made.

Additionally, the report is marred by significant evidential deficiencies, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These shortcomings generate uncertainty regarding the scale and significance of impacts, especially in instances where negligible or non-significant effects are posited 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 stipulated by the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and robust evaluation of environmental effects, placing the competent authority in a position where it cannot make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on environmental effects, it provides a narrative that lacks substance. This approach does not adequately demonstrate that less harmful options have been properly identified, evaluated, and preferred over more damaging solutions.

There is a notable absence of a transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Crucially, the application does not show that the developer has thoroughly considered the option of placing turbines further offshore, where the potential for reducing visual, ecological, and coastal impacts would likely be greater. The West Lewis coastline is sensitive, and the importance of proximity to shore in assessing impact cannot be overstated. The lack of this analysis undermines any assertion that the proposed siting represents the least damaging option available.

The shortcomings also extend to the assessment of cable routing and landfall, with insufficient evidence to suggest that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to provide a clear avoidance strategy and comparative analysis reflects a lack of application of mitigation by design, relying instead on post-design mitigation measures.

As a consequence, the application does not demonstrate that environmental harm has been effectively minimised through the selection of the site, layout, and routing of infrastructure. This indicates a failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a robust assessment of alternatives, it cannot be concluded that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these shortcomings jeopardise compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant 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 proposed development presents significant concerns regarding its impact on marine ecology and protected species. The assessment conducted does not provide a complete or reliable understanding of the ecological receptors within the West Lewis coastal environment, which is a highly sensitive and biologically active marine system. Incomplete baseline data and inadequate methodologies have failed to capture vital information regarding species presence, behaviour, and habitat use. Consequently, this assessment lacks a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity remain insufficiently assessed. Such deficiencies undermine any conclusions regarding the absence of significant effects on the species.

Similarly, the assessment of basking sharks suffers from reliance on aerial surveys, which introduce significant detection bias in Atlantic conditions. This methodology is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider these data leads to an incomplete baseline and further weakens the reliability of the conclusions drawn.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The absence of sufficient baseline data also obstructs meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises serious questions about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In such circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings hinder a robust evaluation of impacts on marine ecology and protected species and lead to the conclusion that the application is lacking a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided within the application exhibits significant deficiencies, characterised by internal inconsistencies and substantial gaps in evidence, which collectively undermine its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to meet the necessary evidential standards to demonstrate that these species will remain unaffected. The proposed development is situated within critical foraging areas and migratory pathways, yet the assessment does not adequately analyse the implications associated with displacement, collision risk, or habitat loss.

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

effects, which contradicts the pursuit of a Habitats Regulations derogation case, a process necessitated only when significant harm is anticipated. This contradiction raises serious concerns regarding the assessment's reliability and suggests that its conclusions lack adequate support from the underlying evidence. Moreover, the assessment does not sufficiently establish that seabirds connected 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 reliance on modelling techniques introduces a degree of uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional and serious risk, effectively forming a barrier along a primary flight path used by birds migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of continued mortality within this corridor, as well as the potential impacts on species with relatively small global populations.

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

The identified deficiencies also signify a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to substantiate that internationally significant seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These weaknesses hinder a thorough evaluation of impacts and lead to the overall conclusion that the application fails to meet the statutory criteria essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented regarding cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of acknowledging the ongoing social, cultural, and spiritual roles that heritage plays within the community, the application adopts a reductive viewpoint, treating heritage as isolated and static assets.

A significant shortcoming is evident in the handling of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are active

locations for burial and spiritual practices, yet they are incorrectly classified as static features in the assessment. This oversight ignores their ongoing usage, significance, and the potential impact of development on their surroundings. Such mischaracterisation results in an incomplete understanding of cultural effects and dismisses their importance to community life.

Moreover, the assessment neglects intangible cultural heritage elements such as the Gaelic language, local traditions, and the historical bond between the community and the coastal environment. These aspects are pivotal to the area's identity but are entirely omitted from the assessment, leading to a critical deficiency. Without addressing these components, the development's cultural impact remains inadequately understood.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People; however, the lack of a process for Free, Prior and Informed Consent calls into question the legitimacy of the assessment. This failure to engage meaningfully undermines established principles of participation in decisions that affect cultural and environmental interests.

A notable procedural failing 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 is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, the identified deficiencies contradict the National Planning Framework 4, particularly concerning the preservation 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 policy expectations.

In summary, the combined failure to assess 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 adequately evaluated, and the application fails to offer a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

There are indications that residents are already experiencing measurable stress,

anxiety, and concern due to the scale and proximity of the proposal. These impacts have been derived from direct engagement with the community and are therefore based on observable facts rather than speculation. However, the failure to disclose the full assessment hinders proper scrutiny of these findings, limiting the ability to assess their significance in the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The 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 lacks the necessary detail to adequately assess construction and pollution risks, rendering the assessment materially deficient. It involves extensive seabed preparation and installation works in a high-energy Atlantic environment, yet no fully developed Construction Environmental Management Plans or Pollution Prevention Plans are provided. Instead, the application relies on future mitigation and contingency measures to be formulated after consent has been granted, which prevents any meaningful evaluation of their potential effectiveness or adequacy.

Particularly alarming is the sensitivity of the West Lewis coastline, which supports clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored. Furthermore, there is a significant degree of uncertainty surrounding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without comprehensive modelling and explicitly defined management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts, which extends to effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the ability of the competent authority to assess environmental protection measures during the determination process. This introduces procedural risk and raises serious concerns regarding regulatory compliance, as the deferral of critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are evaluated before consent is granted; the absence of such information renders a lawful determination impossible.

Overall, the combination of undefined mitigation measures, insufficient management plans, and uncertainties concerning potential impacts collectively signifies that the assessment is incomplete. These deficiencies impede a thorough evaluation of construction and pollution risks, reinforcing the objection to the application.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, lacking a thorough evaluation of ecological and socio-economic repercussions. The coastal waters off West Lewis host a diverse marine ecosystem alongside an active fishing industry. However, the application fails to demonstrate how these vital habitats and activities can be preserved without significant disruption.

A critical concern lies in the assumption that fishing activities can be relocated without negative consequences. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can accommodate the additional pressures that may arise. This oversight is particularly important, as displacing fishing efforts could lead to overfishing in other areas, which may result in broader economic

ramifications for the local fishing fleet. In the absence of a well-supported and clear assessment, the potential impacts on both fisheries and local livelihoods remain poorly understood.

Moreover, the proposal presents considerable risks to marine species, especially from the underwater noise generated during construction activities. High-energy hammer piling over extended periods is expected to create disturbances across considerable distances, which could affect species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming concerns; yet, the application diminishes the importance of these effects without adequate supporting evidence.

Inconsistencies within the application are evident, particularly in acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction undermines the reliability of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm may necessitate legal authorisation.

Furthermore, the assessment fails to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a detailed examination of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be accurately determined.

From a policy standpoint, the application does not show compliance with the National Planning Framework 4 or the National Marine Plan. It does not demonstrate that the proposed development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity, hindering any assertion that the proposal constitutes sustainable development.

Considering these points collectively, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies render the assessment flawed and unreliable. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves onshore infrastructure that has been inadequately assessed, failing to consider the full range of impacts arising from what constitutes a single integrated project. The onshore works, which include cabling across protected moorland and the construction of a substation near Stornoway, are intrinsically linked to the offshore turbines. This assessment is fragmented, obscuring the true scale of both environmental and socio-economic effects.

Significant onshore activities involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically

sensitive habitat. The absence of a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint. By deferring or excluding the evaluation of onshore impacts, the application fails to facilitate a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the separation of offshore and onshore elements results in an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal raises substantial concerns regarding sensitive habitats, including machair systems and peatland environments, which are protected by policy. There is no evidence that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection. Moreover, the disturbance of peatland could release stored carbon, thereby generating a carbon debt that runs counter to the goals of renewable energy development. The application does not sufficiently address this critical issue or demonstrate that the overall carbon balance is maintained as beneficial.

The routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the necessary consents or processes have been initiated, leading to concerns about both the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to conduct a holistic assessment of the project and to demonstrate the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated significantly undermines the application. In conclusion, the separation of project components, the lack of comprehensive assessment, and the absence of evidence on environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a serious oversight in the Environmental Impact Assessment. The West Lewis coastline is distinguished by its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive "wall of light" across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly troubling given the significance of dark skies to the area's identity and to emerging tourism sectors, including astro-tourism. Such omissions result in a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of potential impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not include any assessment of lighting impacts or phototaxis studies, failing to address how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. For example, Kittiwakes may forage or migrate at night and are susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy standpoint, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, it undermines a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological setting.

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

TOURISM

The assessment of tourism impacts within the application is significantly lacking, failing to adequately evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. The application itself states that 86% of visitors are attracted by the scenery; however, it does not provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

The economic growth of tourism is notable, having risen from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for as much as 16% of the island's economy. Nevertheless, the application neglects to model the potential effects of industrialising the seascape and the resulting decline in environmental quality on Tourism Gross Value Added or the resilience of the wider economy. In the absence of this analysis, it remains unclear if the proposed

development would yield a net economic benefit or detract from an established and expanding sector.

Moreover, the assessment does not account for the crucial role of environmental quality in sustaining tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experience and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the impacts on a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the failure to evaluate 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 adequately assessed, 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. Additionally, it contradicts strategic objectives that designate tourism as a priority growth sector and falls short of providing adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

In summary, the combined failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a significant evidential gap. This situation inhibits a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a significant failure to meet the standards for sustainable development as required by statutory duties, national policy, and evidential standards. It revisits the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. This current application is presented under a policy framework that places a stronger emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential basis for this application. There is incomplete baseline data, an undefined design envelope, unspecified reliance on mitigation measures, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects are omitted. The Environmental Impact Assessment is therefore inadequate, lacking the information necessary for a comprehensive understanding of significant effects or residual impacts.

Additionally, there are clear procedural issues. The failure to conduct a compliant Island Communities Impact Assessment breaches statutory duty under the Islands

(Scotland) Act 2018, and the lack of 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, rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage, fails to show that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, masking their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and may be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

This 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 impacts on tourism are permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively inadequate 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 for the application or use the appropriate regulatory provisions to request the submission of the missing information.

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

Additional Comments

Please do not allow this to go ahead. Children do not deserve to have to grow up with this on their doorstep, when there are alternative locations available that would be much more suitable. The full impact of the health impacts and long term damage from sound and vibration from turbines of this size are still unknown, and what is known is negative. It does not seem fair that a whole generation of islanders will essentially become guinea pigs in this process.

The environment also seems to be disregarded in these plans, as there are so many issues outlined that would be detrimental to wildlife, marine life and birds, in addition to the seabed and moorland. These seem to be ignored in the name of raising profits for

international companies.

Please do not allow this destruction to take place as it can't be undone once it has been allowed 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: DE85B9DA

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, which may not align with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There is missing critical environmental data, and baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The flexible design framework used in the application obscures the understanding of likely significant effects, and without specified mitigation measures, it is impossible to evaluate their effectiveness. Consequently, the documentation does not allow for a complete or informed assessment of environmental, cultural, or community impacts, and claims of negligible effects are unsubstantiated.

There are significant policy conflicts present. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, 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 directly impact the statutory tests needed for consent and hinder the competent authority's ability to determine if the development is acceptable under policy guidelines.

The proposal's scale is unprecedented for this area, with large turbines situated near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of inadequate information, reliance on unspecified mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application seeks consent based on an Environmental Impact Assessment Report that is materially deficient, lacking a full, transparent, and reliable account of the likely environmental effects associated with the proposal. A significant concern is the use of a flexible Project Design Envelope, which does not commit to specific turbine

dimensions, layouts, or configurations. This approach introduces substantial uncertainty and undermines the integrity of the assessment, preventing the consistent application of a worst-case scenario. As a result, the impacts presented may not accurately reflect what will ultimately be constructed, hindering both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed subsequently prevents any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established prior to determination.

The report also exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty regarding the scale and significance of impacts, particularly in cases where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

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

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and robust assessment of environmental effects, meaning that the competent authority cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a robust assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, it merely recounts the project's

evolution. This narrative approach does not adequately demonstrate that less harmful options have been identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a notable lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Particularly concerning is the absence of evidence that the developer has seriously considered placing turbines further offshore, a decision that would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impacts, the failure to include such analysis means that the proposed siting cannot be deemed the least damaging option.

The inadequacies extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis suggests that mitigation through design has not been effectively implemented, resulting in a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy, which ultimately hinders the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency significantly undermines adherence to 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 serious omission that leads to the overall conclusion that the application has not been adequately evaluated and cannot lawfully be determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, leading to a lack of reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised by high biological activity and sensitivity. However, the methodologies employed in the assessment fail to adequately document species presence, behaviour, and habitat use, resulting in an incomplete dataset that undermines the evaluation of potential impacts.

One major shortcoming is the inadequate consideration of otters, a species protected under European law. The application does not properly identify or assess their active use of coastal areas, crucial for foraging and movement. By neglecting their core foraging range and behaviour, the potential impacts of construction disturbance, noise, and increased human activity are not sufficiently evaluated. This gap significantly undermines any claims about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces a considerable risk of detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence in these waters. Established land-based observations indicate that these waters are frequently utilised by basking sharks, yet such relevant data has not been appropriately integrated into the assessment, resulting in an incomplete baseline that further weakens the overall conclusions.

These methodological shortcomings mean that the conclusions suggesting negligible or non-significant effects rely more on assumptions than on robust evidence. The lack of adequate baseline data hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including variations by season and interactions within the wider ecosystem. Consequently, there is considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application falls short of the Environmental Impact Assessment requirements and the National Planning Framework 4, primarily due to the inadequate identification and assessment of protected species. The degree of uncertainty involved prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the assessment's unreliable nature stems from incomplete baseline data, flawed methodologies, and conclusions lacking adequate support. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the development proposal is fundamentally unreliable due to a series of internal inconsistencies, methodological flaws, and significant gaps in evidence. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to convincingly demonstrate that these species will not face adverse effects as a result of the proposed development. Key foraging areas and migratory pathways are affected, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A contradiction arises within the application itself, where the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not firmly backed by the available evidence. Furthermore, the assessment does not sufficiently substantiate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain

unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling introduces uncertainties, particularly regarding species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly when baseline data is lacking and behavioural responses are not comprehensively understood.

The proposed siting of turbines within a recognised migratory corridor poses an additional significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to properly assess the long-term implications of ongoing mortality within this corridor and the potential impact on species with relatively small global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met, invoking the precautionary principle and rendering a lawful conclusion in support of consent unattainable.

The shortcomings identified also signify a failure to adhere to the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy. In summary, the assessment is rendered unreliable by its internal contradictions, methodological weaknesses, and insufficient evidence, all of which hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity demonstrates significant inadequacies, failing to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the ongoing social, cultural, and spiritual functions of heritage within the community, the application adopts a simplistic viewpoint that treats heritage as a collection of isolated, static assets.

A notable shortcoming in the application is its handling of culturally significant sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment wrongly categorises them as static features. This oversight neglects their continued use and significance and disregards how development would affect their surroundings. Such mischaracterisation leads to an incomplete understanding of cultural effects and overlooks their essential role in community life.

Moreover, the application does not address intangible cultural heritage, such as the Gaelic language and traditions, alongside the community's long-standing relationship with the coastal environment. These factors are central to the area's identity and are

absent from the assessment, representing a significant gap. Without the inclusion of these elements, the true cultural impact of the proposed development cannot be accurately gauged.

There are additional concerns regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as part of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of genuine engagement undermines the credibility of the assessment and neglects established principles of participation in matters that affect cultural and environmental interests.

Furthermore, a critical procedural deficiency exists in the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, especially concerning the preservation of historic assets and sites. The failure to consider both tangible and intangible heritage, alongside an acknowledgment of living cultural practices, indicates a clear deviation from policy requirements.

In summary, the neglect to assess living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not provide a firm foundation for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is critically lacking, resulting in a deficient evaluation. The developer undertook a Social Impact Assessment that included focus groups with local residents; however, the complete report remains unpublished. This significant evidential gap hinders both the public and the competent authority from fully grasping the social risks highlighted by the developer's own research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects are based on direct engagement, rendering them non-speculative. Nevertheless, the failure to disclose the full assessment limits proper scrutiny of these findings and obstructs the ability to evaluate their relevance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" identified in the developer's findings. Unfortunately, these significant impacts have not been sufficiently integrated into the primary application or afforded the necessary consideration. The withholding of the

complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for projects of this magnitude, especially when the character and functioning of the community could be at stake. The failure to provide the full dataset means that the application does not offer a complete evidential basis for evaluating the balance between benefits and potential harm.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; yet, the evidence available suggests existing adverse effects that have not been thoroughly disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission is significant within the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts on the seascape, landscape, and environment is inadequate. It does not properly reflect the sensitivity of the surroundings or the scale of change that would occur. The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The planned introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally changing this character and leading to a permanent alteration of the landscape.

The proposal does not accurately depict the extent of visual change that would take place. The size and location of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations. This situation would negatively affect visual amenity and diminish the qualities that define naturalness and remoteness. The assessment fails to communicate the significance of this impact within the context of such a sensitive landscape.

Concerns exist regarding the selection and presentation of visual viewpoints. Evidence suggests that the viewpoints chosen may not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-

value landscapes. This possibility raises doubts about the accuracy of the assessed visual impacts, suggesting they may be understated.

Moreover, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape with visual and spatial relationships to the Atlantic horizon. Instead of recognizing their interdependence, the assessment treats these sites in isolation, leading to an incomplete evaluation of their impacts and cultural importance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are experienced and disconnecting them from the natural horizon. This issue represents not just a visual impact but also a more profound cultural and spatial harm that the application fails to adequately address.

From a policy standpoint, the proposal contradicts the National Planning Framework 4, which aims to protect natural places and historic assets. The anticipated changes do not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further calls into question compliance with policy requirements.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Thus, the resulting changes are fundamental and permanent and cannot be sufficiently reduced to acceptable levels through mitigation efforts.

In summary, the assessment fails to accurately reflect the impact scale, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the view that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The incomplete assessment of construction and pollution risks raises significant concerns regarding the potential environmental effects of the proposal. The project necessitates extensive seabed preparation and installation works in a high-energy Atlantic environment. However, the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans limits the ability to evaluate the proposed mitigation and contingency measures, which are deferred until after consent is granted. This reliance on future, undefined measures is particularly alarming given the sensitivity of the receiving environment.

The West Lewis coastline, known for its clean coastal waters and vital habitats, is susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures. Moreover, the uncertainty surrounding the scale and behaviour of sediment plumes

resulting from seabed disturbance and cable installation further complicates the assessment. Without rigorous modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The proposed development raises significant concerns regarding its impact on the local fishing industry and marine life. The waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing community, yet the application fails to adequately protect these vital uses and habitats from disruption. A major concern is the unfounded assumption that fishing activities can be relocated without negative repercussions. The absence of evidence proving that alternative fishing grounds exist or can accommodate increased pressure is troubling, as such displacement could lead to overfishing and broader economic repercussions for local fishers. Without a thorough, evidence-based assessment, the potential impacts on fisheries and community livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, particularly through the noise generated by construction activities. The use of high-energy hammer piling over extended periods is expected to disturb species over considerable distances, including dolphins. The anticipated disruption to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application tends to minimise these potential effects without adequate supporting evidence.

There is a notable contradiction within the application regarding the necessity for

licences to allow harm to European Protected Species, while simultaneously downplaying impacts as negligible. This inconsistency calls into question the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is predicted to require legal authorisation.

Additionally, the assessment fails to address cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and fishing activity displacement. Without a detailed evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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

In summary, the lack of substantiated evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment culminate in a comprehensive failure to evaluate the potential impacts on marine life and fisheries effectively.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the proposed infrastructure onshore is fundamentally inadequate, failing to encompass the full range of impacts associated with what constitutes a singular integrated project. The interdependence of offshore turbines and onshore works is clear; however, they are assessed in isolation, leading to a disjointed analysis that obscures the true magnitude of environmental and socio-economic repercussions.

Included within the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically significant habitat. The application fails to deliver a thorough assessment of these consequences, hindering an accurate understanding of the project's comprehensive environmental impact.

The omission or delay in the evaluation of onshore effects prevents a proper appraisal of cumulative impacts. The Environmental Impact Assessment process mandates that all aspects of a project be reviewed collectively; nonetheless, the distinct treatment of offshore and onshore components means that the compounded effects on peatlands, habitats, and local communities remain insufficiently understood.

Significant risks to sensitive environments, including machair systems and peatland areas, which are subject to policy protections, are also a concern. The application does not adequately illustrate that these habitats have been fully examined for impacts or

that suitable avoidance strategies have been established. This represents a significant evidential shortfall regarding biodiversity safeguarding.

Moreover, the routing of infrastructure through active croft land poses potential conflicts with current land use and legal entitlements. There is no documentation provided to confirm that the required consents or processes have been set in motion, casting doubt on both the feasibility and lawful execution of the project.

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

When considered collectively, the fragmented assessment of project components, the lack of a comprehensive evaluation, and the absence of evidence regarding environmental and land use impacts render this segment of the application both incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, which play a vital role in shaping the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This would drastically change the night-time environment.

Furthermore, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the significance of dark skies to the local identity and the growing tourism sectors, such as astro-tourism. The failure to address these impacts signifies a clear gap in the overall assessment of landscape and environmental factors.

Most importantly, there is no analysis of the potential effects 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 collision risk. The application lacks any lighting impact assessment or phototaxis study, thereby failing to evaluate how the proposed aviation lighting could affect these species or contribute to increased mortality rates.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal behaviour or the associated risks. Kittiwakes, for instance, may forage or migrate at night and could be similarly affected by disorientation from artificial lighting. The absence of site-

specific night-time data creates a critical void in understanding ecological impacts.

Without a comprehensive assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites might be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, thereby invoking the precautionary principle and preventing a lawful determination.

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

Overall, the lack of assessment concerning dark skies and nocturnal wildlife constitutes a considerable evidential gap. The omission of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of substantiating a lawful determination.

TOURISM

The economy of the Isle of Lewis significantly relies on tourism, which has expanded from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this importance, the application in question fails to adequately assess the potential economic and social impacts on this vital sector. While it is noted that 86% of visitors are attracted by the area's scenery, there is no quantified analysis regarding how large-scale offshore infrastructure could influence visitor numbers, behaviours, or the overall economic contributions of tourism.

Moreover, the assessment overlooks the critical relationship between environmental quality and tourism. The unspoiled landscapes, dark skies, and sense of remoteness are essential to the visitor experience, particularly for burgeoning sectors such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortfall, leaving a significant void in understanding the implications for an increasingly recognised component of the local economy.

In addition, the absence of a comprehensive Island Communities Impact Assessment means that the economic vulnerabilities tied to tourism have not been thoroughly evaluated, contrary to the requirements set out in the Islands (Scotland) Act 2018. In a community with limited economic diversification, this oversight poses broader risks to employment, local businesses, and community sustainability. Furthermore, from a policy standpoint, the application does not adequately demonstrate adherence to National Planning Framework 4, especially regarding the necessity for a net economic benefit. It also conflicts with strategic objectives that designate tourism as a priority growth sector and fails to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Ultimately, the shortcomings in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and acknowledging the island's economic reliance culminate in a significant evidential gap. This gap hinders a thorough assessment of economic effects, leading to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable scale of industrialisation was a decisive factor. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential foundation necessary for informed determination.

There are significant deficiencies in the baseline data provided, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the failure to address key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, render the Environmental Impact Assessment inadequate. This lack of completeness prevents a thorough understanding of likely significant effects or any residual impacts.

The procedural failures are evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are sufficient to deem the application unfit for determination.

In direct violation of National Planning Framework 4, the proposal fails to protect biodiversity, natural places, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and precludes 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, disruption of cultural and visual relationships, and negative impacts on tourism are all permanent effects that cannot be sufficiently mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the necessary regulatory provisions to compel 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

I would like to object, in the strongest terms, to the proposed industrialisation of the Westcoast of the Isle of Lewis.

Being a regular visitor & having family living in the area, I have experienced the beauty, the uniqueness of the area, it's wildlife, it's beaches, it's people & culture.

This must not be allowed to happen I would strongly advise the decision makers to go there & see for themselves & if they still think this is the 'best place' to do this, then we have no hope as a people.

This development is for the needs of others and should be sited out to sea or closer to its users . Please do not do this. This is too big, too close & not worth the negative impact.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A68D3607

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and associated documents, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The wind farm is proposed to be located off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the proposal centre on its scale, proximity to the shore, and design, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by strong evidence.

There are significant policy conflicts within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal presents additional concerns, with large turbines positioned very close to the shoreline, raising issues of landscape capacity, visual dominance, and environmental impact. Overall, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions or configurations, creates significant uncertainty. This compromises the assessment's integrity and obscures the true environmental impacts, making it difficult for both the public and the competent authority to grasp the full extent of the effects.

The application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Consequently, consent is sought on the premise that environmental harm will be resolved later, which impedes a meaningful evaluation of their effectiveness and the assessment of residual impacts. This postponement of crucial information to post-consent stages is not procedurally acceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly outlined before a decision is made.

Furthermore, there are considerable evidential deficiencies, including gaps in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. These issues contribute to uncertainty about the scale and significance of impacts, especially where claims of negligible effects are made without substantial supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainties that cannot align with statutory requirements.

As a result, the application does not meet the evidential criteria set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly its stipulations on biodiversity protection and environmental integrity, since it is unclear whether the impacts have been thoroughly assessed or if appropriate safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of clear mitigation strategies, and gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to demonstrate a proper assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application presents a narrative that outlines the project's evolution. This methodology does not establish that less harmful options have been adequately identified, assessed, and chosen over more damaging alternatives.

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

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

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

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a full and dependable understanding of ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet the baseline data is incomplete. The methodologies used do not sufficiently capture species presence, behaviour, and habitat use, leading to a lack of sound evidence for evaluating impacts.

One significant gap involves otters, which are a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. Consequently, the assessment does not consider their core foraging range or behavioural patterns. This oversight means that the potential effects of construction disturbance, noise, and increased activity have not been properly evaluated, undermining claims regarding the absence of significant effects on this

species.

In addition, the assessment of basking sharks shows further deficiencies. The reliance on aerial surveys creates significant detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence, particularly compared to established land-based observations that indicate these waters are frequently used. Not incorporating or properly considering such data contributes to an incomplete baseline and diminishes the reliability of the conclusions.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions. This uncertainty casts doubt on the actual risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been correctly identified or assessed. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These issues obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall finding that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability due to substantial internal inconsistencies and methodological weaknesses. It is crucial to highlight that the application fails to provide adequate evidence that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. The site is situated within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss have not been thoroughly evaluated.

A fundamental contradiction exists within the application itself; while the developer asserts that there are no significant adverse effects, they simultaneously present a case for Habitats Regulations derogation, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. Furthermore, the methodologies used in the assessment are likely to underestimate mortality rates, especially for species like Kittiwakes and Fulmars, where baseline data is lacking and behavioural responses remain unclear.

The positioning of turbines within a recognised migratory corridor presents an

additional risk, as it creates a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. There has been insufficient evaluation of the long-term consequences of sustained mortality in this corridor or the potential repercussions on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside gaps in data and limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent.

Moreover, the deficiencies identified in the assessment represent a failure to adhere to the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that these critical seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

In summary, the assessment is fundamentally flawed, characterised by internal inconsistencies, inadequate methodologies, and a lack of sufficient evidence. These issues collectively hinder a thorough evaluation of impacts, leading to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment associated with this application is fundamentally flawed and overlooks the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising the ongoing social, cultural, and spiritual significance of heritage, the application takes a reductive stance, treating heritage as merely isolated, static assets.

Particularly concerning is the inadequate 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 wrongly categorises them as static features, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage, including the Gaelic language and traditions, along with the long-established relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely overlooked, representing a significant gap in understanding the cultural impact of the development.

There are serious concerns regarding community rights and engagement as well. The Gaelic-speaking population, possessing a unique cultural identity recognised as

characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement diminishes the credibility of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

Crucially, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, violating statutory requirements under 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 repercussions on the island community, rendering any determination unlawful.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, indicates a clear deviation from policy stipulations.

In summation, the lack of evaluation regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a significant evidential gap. The cultural ramifications of the development have not been adequately assessed, and the application lacks a robust foundation for appraising the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal under consideration is accompanied by a Social Impact Assessment commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, resulting in a significant evidential gap. This lack of transparency precludes both public understanding and the competent authority's ability to fully assess the social risks highlighted by the developer's own research.

Summaries available indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement, not speculation. Nevertheless, the failure to disclose the complete assessment hampers the capacity for proper scrutiny and limits the determination of the significance of these findings in the decision-making process.

Evidence suggests that the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's findings. Despite these concerns, such impacts have not been sufficiently integrated into the application or given appropriate consideration. 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 social, economic, and health impacts is critical for developments of this magnitude, especially when community character and functioning may be compromised. The absence of the complete dataset leads to a failure in presenting a comprehensive evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, existing evidence points to adverse effects that remain undisclosed. Without the full assessment, it cannot be shown that the proposal complies with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the lack of access to the complete Social Impact Assessment. This omission is material within the application and reflects a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This undermines the lawful determination of the application and highlights that it lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application lacks a thorough assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its unspoiled Atlantic horizon and an overwhelming sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a persistent and dominating industrial presence, fundamentally transforming this unique character and resulting in permanent and irreversible changes to the landscape.

Furthermore, the visual impact is not represented adequately within the application. The size and proximity of the turbines would overshadow views from residential areas, historic locations, and popular coastal sites, thereby directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This introduces the risk that the visual impact has been understated, casting doubt on the assessment's reliability.

Another critical shortcoming is the lack of evaluation regarding the interconnected

relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected by visual and spatial relationships to the Atlantic horizon. The assessment isolates these heritage assets, ignoring their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their bond with the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that the application fails to adequately assess.

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

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

In summary, the assessment does not accurately capture the extent of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies impede a reliable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate the likely environmental effects. The West Lewis coastline, characterised by clean coastal waters and significant habitats, is particularly sensitive to disturbances, yet the application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be devised after consent, obstructing a meaningful assessment of their adequacy and effectiveness.

Concerns are amplified by the application's acknowledgment of risks such as sediment mobilisation and accidental spills of chemicals or oil, yet it fails to detail how these will be prevented, controlled, or monitored. This reliance on undefined future measures is particularly troubling given the environmental sensitivities involved. Furthermore, there remains considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, the potential extent,

duration, or ecological effects of these impacts cannot be established, leaving the effects on sensitive marine species and habitats inadequately addressed.

Additionally, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application effectively undermines the assessment of whether adequate safeguards are in place to address potential pollution events. This introduces significant procedural risks, hindering the competent authority's ability to evaluate the proposed environmental protection measures at the point of determination.

From a regulatory standpoint, the deferment of essential environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation be assessed prior to consent, and the absence of this critical information renders a lawful determination impossible. The application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application fails to provide a thorough evaluation of the ecological and socio-economic impacts associated with the proposal. There is a pressing concern regarding the assumption that fishing activities can be displaced without any consequences. The lack of evidence demonstrating that alternative fishing grounds are available and able to support additional pressure is particularly concerning. This oversight could lead to overfishing in other areas, impacting the livelihoods of the local fishing fleet.

Moreover, the proposal poses significant risks to marine species, especially through the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is likely to disturb marine life across large distances, affecting species such as dolphins. The predicted impact on a substantial portion of the local bottlenose dolphin population raises serious alarms, yet the application tends to downplay the significance of these effects, lacking sufficient supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This contradiction raises serious concerns regarding compliance with the Habitats Regulations, particularly in instances where harm is anticipated to a level requiring legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts from various

pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents significant deficiencies in the assessment of onshore infrastructure, which is essential to understanding the entire project's impacts. The offshore turbines and onshore works are interconnected; however, they are evaluated in isolation. This fragmented assessment obscures the complete picture of both environmental and socio-economic effects.

Onshore activities include installing cabling across protected moorland and constructing a substation near Stornoway. These developments require access infrastructure through sensitive landscapes and involve excavation in areas of deep peat, especially within Barvas Moor, a crucial carbon store and ecologically delicate habitat. The lack of a thorough assessment regarding these impacts limits the understanding of the project's overall environmental footprint.

By deferring the evaluation of onshore impacts, the application hinders a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components must be considered collectively. The division between offshore and onshore aspects prevents a complete understanding of the combined effects on peatlands, habitats, and local communities.

There are notable risks to sensitive habitats, such as machair systems and peatland areas, which are protected by policy. The proposal fails to show that these habitats have been fully assessed, or that suitable avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

Moreover, the project raises issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The proposal does not satisfactorily address this concern or prove that the overall carbon balance is advantageous.

Routing infrastructure through active croft land may also conflict with established land use and legal rights. The application lacks evidence that necessary consents have been obtained or that proper processes are underway, thus calling into question the feasibility and legality of the implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife is a significant and material omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposed development includes permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" across the western horizon. This change would 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. This lack of consideration is particularly concerning given the critical role of dark skies in the area's identity and the rising importance of tourism sectors like astro-tourism. The oversight leads to a clear gap in the overall landscape and environmental assessment.

Moreover, there is no examination of the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting, which can result in disorientation and an increased risk of collision. The application does not include any lighting impact assessment or a phototaxis study, thereby failing to evaluate how the proposed aviation lighting may affect these species or contribute to increased mortality.

This situation is worsened by the reliance on daytime survey data within the ornithological assessment, which does not adequately capture nocturnal activity or the risks associated with it. For example, species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting. Yet this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of the potential nocturnal impacts, it is impossible to ascertain

whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and preventing 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. It also undermines the more comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

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

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or the overall economic contribution from tourism. This sector relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Despite tourism's growth, from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy, the assessment neglects to model the potential effects of industrialisation on the seascape and loss of environmental quality on Tourism Gross Value Added and broader economic resilience.

Furthermore, the application does not consider the essential role of environmental quality in sustaining tourism. The importance of unspoiled landscapes and dark skies for visitor experiences is particularly relevant to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a significant gap in understanding the impacts on a key aspect of the local economy.

In a community with limited economic diversification, the inadequate assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, which is a requirement under the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This lack of analysis hinders a robust evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this application. It is marked by critical gaps in baseline data, the continued use of an undefined design envelope, and an overreliance on unspecified mitigation measures. Additionally, important impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impact of both offshore and onshore elements has not been adequately evaluated, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially considerable. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their own findings. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, engaging the precautionary principle and precluding any lawful conclusion regarding the acceptability of impacts.

The proposal would result in significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies,

disruption of cultural and visual relationships, and negative impacts on tourism constitute permanent effects that cannot be sufficiently mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, coupled with conflicts with policy and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the pertinent regulatory provisions to request the submission of the necessary missing information.

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

Additional Comments

I am writing as someone who visits the amazing Isle of Lewis, loves the culture, wildlife, seascapes, landscapes and the welcoming Highland hospitality.

I do not wish this project to affect any of the above and I absolutely do not want these turbines to affect the quality of life for the local population.

[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: E340FEE2

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 comprehensive review of the Environmental Impact Assessment Report and accompanying documentation has highlighted significant deficiencies in planning, environmental, cultural, and procedural aspects of the proposal. Situated off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns regarding the development's compatibility with statutory obligations, national policy, and sustainable development principles arise due to its scale, proximity to the shoreline, and design features.

The application lacks an adequate evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. Furthermore, the use of a flexible design framework obfuscates the understanding of potential significant effects, while the dependence on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive or informed evaluation of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are evident and substantial conflicts with policy requirements. The proposal appears to contravene the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national standards for protecting biodiversity, climate considerations, and environmental integrity. These policy conflicts directly impact the statutory tests essential for consent and jeopardise the competent authority's ability to determine the development's acceptability from a policy standpoint.

The unprecedented scale of this proposal, with large turbines placed in proximity to the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not give a clear or dependable account of the potential environmental impacts of the proposed development. There is significant uncertainty due to the use of a flexible Project Design Envelope, which avoids commitment to specific details such as turbine dimensions and layouts. This uncertainty hinders a consistent worst-case scenario analysis and compromises the overall integrity of the assessment. Consequently, the public and the competent authority are unable to grasp the full scope of the environmental effects that the project may cause.

The application depends heavily on mitigation strategies, monitoring plans, and management measures that have not been outlined. By seeking consent based on the promise that environmental damage will be mitigated later, the application prevents any thorough assessment of the effectiveness of these measures or consideration of residual impacts. This postponement of essential information until after consent is granted is unacceptable from a procedural standpoint and undermines the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly defined before any decisions are made.

There are notable gaps in evidence, such as insufficient baseline data, methodological limitations, and a reliance on assumptions instead of solid, site-specific evidence. This lack of information creates uncertainty about the magnitude and significance of impacts, particularly when claims of negligible or non-significant effects are made without adequate supporting data. The insufficient detail leads to an unclear picture of cumulative and worst-case impacts and introduces scientific uncertainties that conflict with statutory requirements.

Therefore, the application does not fulfil the evidential standards set by the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation calls for the precautionary principle to be applied, particularly concerning protected species and vulnerable habitats. Moreover, the proposal does not satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough evaluation of environmental impacts, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The current application fails to adequately assess alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, it provides only a narrative of the project's

development. This lack of analysis indicates that less harmful options have not been appropriately identified, assessed, or chosen over more damaging alternatives.

There is no clear or evidence-based comparison concerning alternative offshore locations, scales of development, or design configurations. Notably, the application does not show that the developer has thoroughly examined the possibility of situating turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The West Lewis coastline's sensitivity and the significance of proximity to shore in determining impact highlight that without such an analysis, it cannot be established that the proposed siting is the least damaging option.

The shortcomings also extend to the assessment of cable routing and landfall, revealing a lack of sufficient evidence that alternative routes have been fully investigated to minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The failure to present a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been considered, with a greater reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This lack of adherence to the established mitigation hierarchy hinders the competent authority's ability to determine if there are less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with policy requirements.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, especially regarding the protection of natural spaces, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant shortcoming that supports the overall conclusion that the application has not undergone adequate assessment and therefore cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, leading to a lack of reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised by high biological activity and sensitivity. However, the methodologies employed in the assessment fail to adequately document species presence, behaviour, and habitat use, resulting in an incomplete dataset that undermines the evaluation of potential impacts.

One major shortcoming is the inadequate consideration of otters, a species protected under European law. The application does not properly identify or assess their active use of coastal areas, crucial for foraging and movement. By neglecting their core foraging range and behaviour, the potential impacts of construction disturbance, noise, and increased human activity are not sufficiently evaluated. This gap significantly undermines any claims about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces a considerable risk of detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence in these waters. Established land-based observations indicate that these waters are frequently utilised by basking sharks, yet such relevant data has not been appropriately integrated into the assessment, resulting in an incomplete baseline that further weakens the overall conclusions.

These methodological shortcomings mean that the conclusions suggesting negligible or non-significant effects rely more on assumptions than on robust evidence. The lack of adequate baseline data hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including variations by season and interactions within the wider ecosystem. Consequently, there is considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application falls short of the Environmental Impact Assessment requirements and the National Planning Framework 4, primarily due to the inadequate identification and assessment of protected species. The degree of uncertainty involved prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the assessment's unreliable nature stems from incomplete baseline data, flawed methodologies, and conclusions lacking adequate support. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application is devoid of a sufficient evidential foundation.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is deficient, lacking the necessary detail to evaluate potential environmental impacts adequately. The proposal entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be formulated after consent, which hampers any meaningful assessment of their sufficiency or effectiveness.

This dependency on unspecified future measures raises particular alarm given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to detail how these incidents will be prevented, managed, or monitored.

There remains uncertainty regarding the scale and dynamics of sediment plumes that

could result from seabed disruption and cable installation. In the absence of comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether adequate measures are established to respond to pollution incidents. This creates procedural risks and diminishes the ability of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be evaluated prior to consent, and the absence of such information renders a lawful determination impossible. The application also does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Overall, the failure to provide defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts lead to an assessment that is materially inadequate. These deficiencies inhibit a thorough evaluation of construction and pollution risks and further substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries related to this application lacks robustness and fails to address significant ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital habitats and uses can be preserved without considerable disruption.

A critical concern is the presumption that fishing activity can be moved without repercussions. The application does not provide any evidence that alternative fishing grounds are available, accessible, or capable of handling increased activity. This lack of information is crucial, as displacing fishing could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods cannot be accurately assessed.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb a wide area, adversely affecting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns, yet the application

appears to minimise the importance of these effects without adequate supporting evidence.

There is a noticeable inconsistency in the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while simultaneously stating that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially in light of anticipated harm that may require legal approval.

Moreover, the assessment neglects to address the cumulative impacts stemming from multiple pressures, such as habitat disruption, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It falls short of showing that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal represents sustainable development.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a substantial oversight within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism potential. The proposed development would introduce permanent red aviation lighting, creating a continuous and intrusive "wall of light" that would drastically change the night-time atmosphere.

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

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

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

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

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

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

TOURISM

The assessment of the proposed development lacks essential detail regarding its potential impacts on tourism, a crucial sector for the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the island has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. This lack of analysis leaves uncertainty as to whether the development would yield a net economic benefit or adversely affect an already thriving sector.

Additionally, the assessment overlooks the significance of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. Emerging markets such as nature-based tourism and astro-tourism are also not addressed. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impacts on a vital segment of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts poses broader consequences for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been scrutinised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the need to establish net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to furnish adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic reliance result in a substantial evidential void. This gap hinders a thorough assessment of the economic consequences and contributes to the conclusion that the application is fundamentally 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

This will have a severe mental impact on all residents of the western isles. Some may even take their lives

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: 8DA93FF5

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 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 application lacks a robust assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Rather than offering a structured comparison of viable alternatives based on environmental effects, it presents a narrative account of project evolution. This method does not adequately demonstrate that less harmful options have been properly identified, assessed, and

selected over more damaging solutions.

There is also a noticeable absence of a transparent or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Particularly, the application does not show that the developer has genuinely considered positioning the turbines further offshore, where the visual, ecological, and coastal impacts would likely be lessened. Given the sensitivity of the West Lewis coastline and the significant role that proximity to shore plays in determining impact, the lack of such analysis undermines any assertion that the proposed siting is the least damaging option.

The deficiencies are evident in the assessments of cable routing and landfall, where the evidence fails to show that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors. This includes locations of cultural and spiritual significance such as Barvas Cemetery. The omission of a clear avoidance strategy and the absence of comparative analysis indicate that there has been no application of mitigation by design, with reliance instead on post-design measures.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This signifies a disregard for the established mitigation hierarchy, hindering the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it is impossible to conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, particularly concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment represents a material omission that ultimately supports the conclusion that the application has not been thoroughly assessed and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species associated with the proposal is significantly lacking, failing to offer a thorough and dependable understanding of ecological receptors in the West Lewis coastal area. This marine system is both highly sensitive and biologically active, yet the existing baseline data remains incomplete, while the methodologies employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, the assessment does not furnish a sound evidential framework for assessing potential impacts.

One notable gap concerns otters, which are 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 oversight of their core foraging areas and behavioural patterns leads to an inadequate evaluation of the possible impacts stemming from construction activities, noise, and increased human

activity. This deficiency undermines any assertions about the lack of significant effects on the otter population.

Moreover, the assessment of basking sharks exhibits further shortcomings, particularly due to reliance on aerial surveys that introduce considerable detection bias, especially under Atlantic weather conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that demonstrate frequent usage of these waters. The exclusion or insufficient consideration of such data results in an incomplete baseline and diminishes the trustworthiness of the conclusions drawn.

These methodological flaws indicate that the assertions of negligible or non-significant effects rest more on presumptions than on solid evidence. The lack of comprehensive baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment framework and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. The uncertainty introduced by these shortcomings means that it is impossible to rule out adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these issues, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents a fundamentally flawed ornithological assessment, characterised by significant gaps in evidence and internal contradictions that seriously undermine its conclusions. The proposed development is situated within critical foraging areas and migratory pathways on the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already in decline. The applicant fails to demonstrate, to the required evidential standard, that these species will not face adverse impacts.

The assessment exhibits a critical inconsistency; the developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious doubts about the assessment's reliability and suggests that the conclusions drawn are not underpinned by robust evidence.

Moreover, the assessment lacks sufficient evidence regarding seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, ensuring their protection from adverse effects remains unproven. The importance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces a level of uncertainty, particularly for species like Kittiwakes and Fulmars, which are in severe decline. The methodologies employed risk underestimating mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor further exacerbates this situation, as it creates a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor, nor does it consider the potential effects on species with relatively small global populations.

Regulatory concerns arise as the application fails to meet the evidential threshold needed to assert there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and the limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This raises the precautionary principle, which precludes a lawful conclusion in favour of consent.

Additionally, the deficiencies noted demonstrate a lack of compliance with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to confirm that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These flaws hinder a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed. It fails to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Instead, the application adopts a simplistic view, treating heritage as isolated, static assets while neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they have been categorised as static features in the assessment. This oversight disregards their continued significance, use, and the development's potential impact on their setting, leading to an incomplete evaluation of cultural effects and a failure to acknowledge their importance to community life.

Furthermore, the application does not take into account intangible cultural heritage aspects, such as the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These factors are integral to the area's identity and their absence from the assessment represents a major shortcoming. The lack of consideration for these elements prevents a proper understanding of the cultural impact of the proposed development.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity recognised as characteristic of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the legitimacy of the assessment and does not reflect established principles of participation in decisions affecting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, thereby 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, along with the disregard for living cultural practices, clearly departs from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a sufficient basis to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This absence of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Available summaries highlight that residents are already experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not speculative. Yet, without the complete assessment, proper scrutiny of these findings is impossible, limiting the capacity to evaluate their significance in the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to

community identity and cohesion, with references to "cultural loss" noted within the developer's findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The lack of access to the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning may be jeopardised. The failure to provide the complete dataset means the application lacks a comprehensive evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and avoid adverse impacts; however, the existing evidence reveals harmful effects that remain undisclosed. Without the full assessment, it cannot be established that the application aligns with this policy.

The procedural implications of these omissions are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a critical shortfall in the application and signifies a failure to meet the evidential requirements of the Environmental Impact Assessment framework.

Overall, the non-disclosure of the complete Social Impact Assessment, combined with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application is not sufficiently substantiated.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed turbines is significantly lacking and does not adequately capture the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and pronounced sense of remoteness. Introducing large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character and lead to a permanent transformation of the landscape.

Moreover, the application fails to represent the true magnitude of the visual changes. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, thus directly impacting visual amenity and undermining the naturalness and sense of remoteness that define the area. The assessment does not sufficiently communicate this level of impact or its significance within such a sensitive landscape context.

Concerns also arise regarding the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not accurately depict the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the visual impact has been understated, compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural importance.

The proposed industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are experienced and severing their connection to the natural horizon. This represents not only a visual impact but also a broader cultural and spatial detriment that has not been adequately assessed.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the preservation of natural spaces and historic assets. The proposed changes are incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than being reducible 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 determination that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal requires extensive seabed preparation and installation works within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. The assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects. Instead, the application 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 unspecified future measures is especially alarming, considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean

coastal waters and significant 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 detail on the methods to prevent, control, or monitor these occurrences.

There remains 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 becomes impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures effectively at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated before consent is granted, and the absence of such information means a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts contribute to a materially deficient assessment. These shortcomings preclude a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal under consideration raises significant concerns regarding the potential impact on local 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 sufficiently demonstrate that these vital habitats and uses can be preserved without considerable disruption.

One major concern lies in the assumption that fishing activities can be displaced without any negative effects. The application lacks evidence indicating the availability or accessibility of alternative fishing grounds that could adequately support the additional pressure. This is an important omission, as the risk of overfishing in other areas could have serious economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment hampers the understanding of the impacts on both fisheries and local livelihoods.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise created during construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life across significant distances, including species like dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population is alarming, yet the application appears to minimise these impacts without adequate supporting evidence.

Moreover, the application contains a notable inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction casts doubt on the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to a level that requires legal authorisation.

The assessment also fails to adequately consider the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, the overall implications for marine ecosystems and socio-economic conditions remain undetermined.

From a policy standpoint, the application does not prove compliance with the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, undermining any claims of sustainable development.

In summary, the significant deficiencies in the assessment—including the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal contradictions—render it incomplete and unreliable. These issues prevent a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not adequately consider the impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are inherently connected, yet they are assessed in isolation. This fragmented approach obscures the true extent of environmental and socio-economic effects.

The onshore components consist of cabling across protected moorland, the construction of a substation near Stornoway, and the required access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The current application lacks a comprehensive assessment of these impacts, thus hindering a full understanding of the project's overall environmental footprint.

Exclusion or deferment of onshore impact assessments prevents a thorough evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; however, the segmentation of offshore and onshore elements leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that the impacts on these habitats have been fully evaluated or that appropriate avoidance measures have been implemented. This creates a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance also arise from the proposal. The disturbance of peatland results in the release of stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue nor does it show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that the requisite consents or processes have been initiated, which raises questions about the deliverability and lawful execution of the project.

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

In summary, the division of project components, the lack of a comprehensive assessment, and the absence of evidence regarding environmental and land use impacts result in this section of the application being incomplete and unreliable, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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.

TOURISM

The assessment presented in the application lacks a comprehensive evaluation of the tourism impacts, which are critical to the Isle of Lewis economy. With tourism reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness, it is concerning that the application fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of the sector. Notably, 86% of visitors are attracted by the scenery, yet this connection is not sufficiently explored.

The growth of tourism in the region has been remarkable, rising from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while constituting up to 16% of the island's economy. However, the potential consequences of industrialising the seascape and the subsequent loss of environmental quality on Tourism Gross Value Added, as well as wider economic resilience, are overlooked in the application. This lack of modelling raises concerns about whether the proposed development would ultimately yield a net economic benefit or detriment to this vital sector.

Moreover, the assessment neglects to consider the environmental quality factors that underpin tourism, including the significance of unspoiled landscapes and dark skies for

visitor experiences and emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this deficiency, leaving a critical gap in understanding how these factors contribute to a recognised and expanding area of the local economy.

In a context where the island community faces limited economic diversification, the oversight of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated, contrary to the requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to illustrate net benefit. Furthermore, it conflicts with strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to assess the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the island's economic dependency result in 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 presents a significant inadequacy in meeting the criteria for sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable extent of industrialisation was highlighted. This current proposal, however, is put forward within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

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

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

the application unfit for consideration.

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

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

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

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

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

Additional Comments

Although I currently reside in Stornoway, my family are from the Westside. I rent 2 crofts in Shawbost and am still active in the community.

A windfarm of this scale, this close to shore, will have a devastating impact on the local community.

The community being impacted will see absolutely none of the benefits, but we, and those who come after us will pay the price.

What kind of world do we live in where the wishes of a community are completely ignored? I have yet to meet a local person who is in favour.

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: 9C589A76

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and associated documentation has revealed material deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the scale, proximity, and design of the project, which challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential foundation for a lawful determination. Significant environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain unspecified. The application's flexible design framework hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available 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 evident and serious policy conflicts present in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not sufficiently demonstrate adherence to national mandates aimed at safeguarding biodiversity, climate interests, and environmental integrity. Such discrepancies directly relate to the statutory tests necessary for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The proposal's scale is unprecedented for this location, featuring large turbines situated in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impacts. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance illustrate 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 Environmental Impact Assessment Report suffers from significant deficiencies, leading to an incomplete and unreliable understanding of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity hinders the application of a worst-case scenario, thereby compromising the assessment's integrity and preventing both the public and competent authorities from fully grasping the true extent of the environmental impacts.

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 mitigated later obstructs any meaningful evaluation of effectiveness and the assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally inappropriate and conflicts with the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigation strategies be clearly identified before determination.

The report also exhibits severe evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Such deficiencies result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not fulfil the evidential criteria set out in the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not align with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been demonstrated that impacts have been adequately assessed or that suitable safeguards are established.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and robust evaluation of environmental effects, leaving the competent authority unable to make an informed determination based on the information available.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough assessment of alternatives, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. It does not offer a structured, reasoned comparison of realistic alternatives based on their environmental effects. Instead, it presents a narrative regarding the project's

development, which does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is no evidence-based or transparent comparison of alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has genuinely 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, the lack of such analysis obstructs any conclusion that the proposed siting is the least damaging option.

Additionally, the deficiencies extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately explored to mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy, coupled with the lack of comparative analysis, illustrates that mitigation by design has not been implemented. Instead, reliance appears to be placed solely on post-design mitigation measures.

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

From a policy standpoint, these deficiencies compromise 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 represents a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is characterised by its high sensitivity and biological activity, yet the assessment of marine ecology and protected species is fundamentally flawed. The baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of important species. This lack of thoroughness results in an assessment that fails to offer a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment involves otters, which are classified as a European Protected Species. The application does not adequately recognise or assess the active use of coastal areas by otters for foraging and movement. The oversight of their core foraging range and behavioural patterns means the potential effects of construction disturbances, including noise and increased activity, have not been properly evaluated.

This failure undermines any conclusions drawn about the absence of significant effects on the species.

Additional shortcomings are evident in the assessment of basking sharks, where the dependence on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The neglect to incorporate or adequately consider such data results in a deficient baseline, ultimately undermining the reliability of the conclusions reached.

These methodological inadequacies lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. Moreover, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including 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 fulfil the criteria set out by 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 shortcomings prevents any exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. In light of this, consent cannot be lawfully granted.

Overall, the presence of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These deficiencies hinder a robust evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment related to the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. The development is situated within key foraging areas and migratory pathways, yet the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss for these species.

A key contradiction exists in the application, where the developer asserts no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is typically only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not underpinned by adequate evidence. Furthermore, the assessment does not sufficiently 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 methods introduces uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, especially given incomplete baseline data and the lack of understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces a considerable risk, effectively creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term implications of sustained mortality in this corridor or the potential effects on species with comparatively small global populations.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is recognised as a living cultural landscape where the environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity fails to acknowledge this relationship and adopts a reductive view, treating heritage merely as isolated, static assets. This approach neglects their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. The assessment, however, erroneously categorises them as static features, overlooking their continued use and the development's impact on their surroundings. This mischaracterisation results in an incomplete evaluation of the cultural effects and disregards the sites' importance to community life.

Moreover, the assessment does not consider intangible cultural heritage, including the Gaelic language and traditions, which are integral to the area's identity. The failure to include these elements represents a substantial omission that impedes a proper

understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, identified as possessing a distinct cultural identity akin to that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles regarding participation in matters affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment contravenes the statutory requirement set out in the Islands (Scotland) Act 2018. Without this crucial assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which prevents a lawful determination.

These shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to account for both tangible and intangible heritage, as well as the living cultural practices of the community, constitutes a clear deviation from policy requirements.

Ultimately, the collective failures to assess living heritage, intangible cultural value, community rights, and statutory obligations result in a significant evidential gap. The application does not adequately address the cultural impacts of the development, providing an insufficient basis for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding social impacts, health, and wellbeing, which remain inadequately assessed and lack the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the comprehensive report has not been made publicly available. This lack of access constitutes a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own research.

Reports suggest that local residents are currently facing measurable stress, anxiety, and apprehension due to the scale and proximity of the development proposal. These negative impacts stem from direct engagement with the community and are not mere speculation. Nonetheless, the absence of the full assessment obstructs proper examination of these findings and restricts the capacity to gauge their importance in the decision-making process.

Furthermore, there is evidence indicating that the proposed development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Unfortunately, these identified impacts have not been

adequately incorporated into the main application nor afforded appropriate consideration. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be at stake. By failing to provide the complete dataset, the application does not present a comprehensive evidential foundation needed for assessing the balance between benefits and detriments.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 concerning health and wellbeing. Developments are mandated to promote positive health outcomes and avert harm, yet the information presently available indicates existing negative effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications arising from this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission represents a material deficiency within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, together with 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 information to proceed.

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 proposal requires extensive seabed preparation and installation works within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. The assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate the likely environmental effects. Instead, the application 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 unspecified future measures is especially alarming, considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean

coastal waters and significant 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 detail on the methods to prevent, control, or monitor these occurrences.

There remains 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 becomes impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also pertains to the potential effects on marine species and habitats already identified as sensitive in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the evaluation of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures effectively at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated before consent is granted, and the absence of such information means a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts contribute to a materially deficient assessment. These shortcomings preclude a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the proposed development's impact on fisheries and marine life is inadequate and does not provide a comprehensive evaluation of ecological or socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses can be preserved or sustained without significant disruption.

A critical concern is the presumption that fishing activities can be relocated without any adverse effects. The application fails to present any evidence indicating that alternative fishing grounds are available, accessible, or able to accommodate the increased pressure. This omission is particularly notable as displacement could lead to overfishing in other areas and could adversely affect the local fishing fleet's economic stability. The lack of a clear and evidence-based evaluation prevents a proper

understanding of the implications for fisheries and the livelihoods dependent upon them.

Furthermore, the proposal poses considerable risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling for prolonged periods is likely to cause disturbances over considerable distances, adversely affecting species such as dolphins. The predicted disturbance to a substantial portion of the local bottlenose dolphin population raises significant concerns, yet the application minimises the importance of these impacts without adequate supporting evidence.

The application contains a noticeable inconsistency regarding the acknowledgement of the necessity for licences to permit harm to European Protected Species, while simultaneously categorising impacts as negligible. This contradiction undermines the reliability of the assessment and raises issues related to compliance with the Habitats Regulations, especially where harm is projected to the extent that requires legal approval.

Additionally, the assessment does not adequately consider cumulative impacts resulting from multiple pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. The absence of a thorough evaluation of these combined effects hampers the ability to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which hinders any conclusion regarding the sustainability of the proposal.

In summary, the deficiencies related to the evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies of the assessment render it incomplete and unreliable. These shortcomings obstruct a thorough evaluation of the impacts on 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 West Lewis coastline is defined by its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the burgeoning tourism sector, particularly astro-tourism. However, the proposal under consideration includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This would fundamentally disrupt the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment.

Significantly, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. The omission is particularly concerning given the vital role dark skies play in the area's identity. Furthermore, the lack of consideration for nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. Without a lighting impact assessment or phototaxis study, the application does not address how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is aggravated by an over-reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, which may forage or migrate at night, also face disorientation due to artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a substantial gap in understanding ecological impacts.

Without an evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It further diminishes the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall landscape.

In summary, 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 incapable of 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 represents a significant failure to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this under an enhanced policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the fundamental shortcomings.

There are notable deficiencies in the evidential basis required for determining the application. Critical gaps exist in baseline data, and there remains an undefined design envelope alongside unspecified reliance on mitigation measures. Furthermore, key impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism impacts, have been overlooked. Consequently, the Environmental Impact Assessment is insufficient, impeding a comprehensive understanding of likely significant effects or residual impacts.

Additionally, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the incomplete disclosure of the Social Impact Assessment represents a serious omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is in direct contradiction with National Planning Framework 4. It fails to

adequately protect biodiversity, natural environments, and cultural heritage, does not 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 effects of both offshore and onshore components have not been thoroughly assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals are internally inconsistent and do not satisfy the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, precluding a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The vast array of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuses consent on these grounds or employs the relevant regulatory provisions to obtain the necessary missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 579B9A3A

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, particularly the placement of large turbines in close proximity to the shoreline, introduce significant concerns regarding landscape capacity, visual dominance, and overall environmental impact.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Key aspects of the proposal remain undefined, and the use of a flexible design framework hinders a clear understanding of likely significant effects. Additionally, the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Furthermore, there are substantial 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 fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and undermine the capacity of the competent authority to deem the development acceptable within policy parameters.

In light of these deficiencies, the absence of adequate information, reliance on undefined mitigation strategies, and evident policy non-compliance collectively demonstrate 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 Environmental Impact Assessment Report is incomplete and fails to deliver a full, transparent, or dependable account of the potential environmental effects of the proposal. The flexible Project Design Envelope used lacks commitment to specific turbine dimensions, layouts, or configurations, introducing significant uncertainty. This flexibility obstructs a consistent application of a worst-case scenario, undermining the

integrity of the assessment. As a result, the impacts presented may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that have not yet been defined. This approach prevents any meaningful evaluation of effectiveness or assessment of residual impacts, as it relies on the notion that environmental harm will be addressed at a later stage. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly before determination.

The report also shows significant evidential deficiencies, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of impacts, especially where conclusions regarding negligible or non-significant effects are drawn. The insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled 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 situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of a reasoned comparison of realistic alternatives based on their environmental effects, it provides a narrative of project development. This approach does not show that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is no transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. The developer has not adequately considered placing turbines further offshore, which could potentially reduce visual,

ecological, and coastal impacts. The sensitivity of the West Lewis coastline makes the proximity to shore crucial in determining impact. Without this analysis, it is impossible to conclude that the proposed siting is the least damaging option.

The shortcomings also apply to cable routing and landfall assessment, as there is insufficient evidence that alternative routes have been explored to lessen impacts on sensitive receptors. This includes important cultural and spiritual sites such as Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests a lack of mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy and leaves the competent authority unable to determine if less harmful and more suitable alternatives exist. Without a thorough alternatives assessment, it cannot be said that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to 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 significant omission, further contributing to the conclusion that the application has not been thoroughly evaluated and cannot receive a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents significant deficiencies in the assessment of marine ecology and protected species, particularly within the context of the West Lewis coastal environment, which is noted for its sensitivity and biological activity. The methodologies employed in the assessment fail to adequately capture crucial information regarding species presence, behaviour, and habitat use, leading to an incomplete understanding of ecological receptors. Consequently, the evidential basis for evaluating impacts is insufficient.

A notable shortcoming involves the treatment of otters, recognised as a European Protected Species. The assessment does not adequately account for their active use of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns results in a failure to assess the potential impacts of construction-related disturbance, noise, and increased activity. This oversight raises questions about the validity of the conclusions drawn regarding the absence of significant effects on this species.

Further limitations are evident in the evaluation of basking sharks, where reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that suggest

frequent usage of these waters. The lack of integration or proper consideration of such data contributes to an incomplete baseline, undermining the reliability of the conclusions reached.

The methodological flaws present in the assessment mean that the conclusions of negligible or non-significant effects are largely based on assumptions rather than on solid evidence. The absence of sufficient baseline data hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory viewpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents any exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it follows that consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to demonstrate, to the required evidential standard, that the internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. This region supports many seabird species that are already in decline, yet the ornithological assessment provided is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment does not adequately evaluate the implications of habitat loss, displacement, or collision risk, despite the development being situated within key foraging areas and migratory pathways.

A fundamental contradiction exists in the application, where the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This approach is only necessary when significant harm is anticipated, which raises serious doubts about the reliability of the assessment. It suggests that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not convincingly establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial importance of these feeding grounds is inadequately addressed, and the reliance on modelling methods introduces uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, particularly where baseline data is lacking and the behavioural responses of the birds are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a significant risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been sufficiently assessed, nor have the potential effects on species with relatively small global populations been adequately considered.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interwoven. The approach taken in the application is overly simplistic, treating heritage merely as a collection of disconnected, static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming is evident in the handling of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely historical landmarks; they are active spaces for burial and spiritual practice. However, the assessment wrongly categorises them as static elements, failing to take into account their continued use and the broader implications of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and overlooks their vital role in community life.

Moreover, the application neglects the assessment of intangible cultural heritage, which includes the Gaelic language, local traditions, and the deep-rooted relationship between the community and the coastal environment. These aspects are essential to the area's identity and were notably absent from the assessment, indicating a significant oversight. Without recognising these elements, a true understanding of the development's cultural impact remains elusive.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as having characteristics of an Indigenous People. Yet, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement not only undermines the credibility of the assessment but also fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Additionally, there is a critical procedural failure concerning the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The omission of this assessment means that the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This lack of compliance hinders any lawful determination of the proposal.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, particularly regarding the protection of historic sites and cultural spaces. The failure to consider both tangible and intangible heritage, alongside the recognition of living cultural practices, represents a notable deviation from required policies.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory obligations create a significant evidential gap. As a result, the cultural impacts of the development have not been thoroughly evaluated, and the application does not offer a robust basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, creating a significant evidential gap that hampers both public understanding and the competent authority's ability to evaluate social risks. Although the developer conducted a Social Impact Assessment and engaged local residents through focus groups, the lack of transparency around the full report prevents proper scrutiny of its findings. Available summaries reveal that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement, highlight the urgency of the issue but remain inadequately addressed due to the failure to disclose the complete assessment.

Concerns have been raised about the proposal posing a direct threat to community identity and cohesion, with “cultural loss” noted in the developer's findings. However, these significant impacts have not been fully integrated into the main application or given appropriate consideration. The withholding of the full assessment obscures the true human and social costs associated with the development, undermining the overall transparency required for informed decision-making.

This lack of clarity also undermines the Environmental Impact Assessment process, as

a thorough understanding of social, economic, and health impacts is critical for developments of this magnitude. The application's failure to provide complete data means it does not present a sufficient evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing, as it must promote positive health outcomes and avoid adverse effects. The available evidence suggests existing negative impacts that have not been adequately disclosed, making it impossible to ascertain compliance with this policy without the full assessment.

The procedural ramifications are considerable. Without access to the complete Social Impact Assessment, the competent authority cannot perform a thorough socio-economic and health evaluation. This omission represents a material failure to meet the evidential requirements set forth by the Environmental Impact Assessment framework. Overall, the non-disclosure of the full Social Impact Assessment, paired with evidence of existing adverse impacts, results in an incomplete and unreliable assessment, hindering lawful determination and underscoring the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally inadequate, failing to reflect both the scale of change anticipated and the sensitivity of the receiving environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, a largely undeveloped landscape, and a notable sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would impose a continuous and overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application does not sufficiently represent the extent of this visual change. Given the size and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. Such a situation would directly compromise visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its significance within the context of this sensitive landscape.

Concerns arise regarding the methodology employed in selecting and presenting visual viewpoints. Available evidence indicates that the chosen viewpoints may inadequately represent the most sensitive receptors or potential worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This shortcoming introduces a risk that the visual impact has been understated, thus undermining the overall reliability of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais

Standing Stones, along with other Scheduled Monuments, are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. Treating these as isolated elements fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The proposed scale of change contradicts the imperative to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further detracts from any assertion of policy adherence.

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 resulting changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

Collectively, these deficiencies illustrate that the assessment fails to accurately convey the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. Such shortcomings hinder a dependable evaluation and substantiate the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess construction and pollution risks adequately. It involves significant seabed preparation and installation in the challenging conditions of the Atlantic, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, it depends on mitigation and contingency measures that are to be formulated after consent, making it impossible to meaningfully evaluate their effectiveness.

This lack of clearly defined future measures is alarming, especially considering the delicate nature of the West Lewis coastline, which features clean coastal waters and sensitive habitats at risk from sediment disturbance and pollution. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical spills, it fails to detail how these issues will be managed or mitigated.

Moreover, there is considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from the proposed activities. Without thorough modelling

and well-defined management strategies, it is not feasible to ascertain the extent or ecological implications of these disturbances, including their effects on marine species and habitats that are known to be vulnerable.

The situation is exacerbated by the absence of detailed emergency response procedures. Deferring essential contingency planning to after consent restricts the ability to evaluate whether appropriate measures are in place for addressing pollution incidents, increasing procedural risk and hindering the competent authority's ability to enforce environmental safeguards at the determination stage.

From a regulatory standpoint, the postponement of crucial environmental protections contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be reviewed before granting consent, and when vital information is absent, a lawful decision cannot be reached. The application also does not demonstrate adherence to policies regarding environmental protection and water quality.

Overall, the lack of defined mitigation strategies, inadequate management plans, and uncertainty surrounding potential environmental impacts collectively render the assessment severely deficient. These issues hinder a thorough evaluation of construction and pollution risks and further confirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents serious deficiencies in its assessment of fisheries and marine life, which fails to adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these essential uses and habitats can be preserved without causing significant disruption.

A critical flaw in the application is the assumption that displacing fishing activities will not have consequences. There is a lack of evidence regarding the availability or accessibility of alternative fishing grounds that could support the additional pressure. This gap in the assessment is significant, as it poses the risk of overfishing in other areas and may lead to broader economic ramifications for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and the livelihoods of those who depend on them remain unclear.

The proposal introduces notable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged high-energy hammer piling is expected to disturb marine life over large distances, with particular concern for species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application downplays these effects without providing adequate supporting evidence.

Moreover, the application contains an internal inconsistency, as it acknowledges the need for licenses to allow harm to European Protected Species while simultaneously

describing the impacts as negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby failing to confirm that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore works, including cabling across protected moorland and the construction of a substation near Stornoway, which necessitates access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, obscuring the project's overall environmental footprint.

The assessment approach is fragmented, as it treats the offshore turbines and onshore works separately, failing to acknowledge the intrinsic link between these components. This separation prevents an accurate evaluation of the cumulative effects on peatlands, habitats, and local communities. The Environmental Impact Assessment process stipulates that all project components must be considered collectively; however, the current application neglects this essential requirement.

Moreover, the proposal poses significant risks to sensitive habitats, including machair systems and peatland environments that are protected under policy. There is no evidence demonstrating that the impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, leaving a glaring gap in biodiversity protection.

Concerns regarding carbon balance are also evident, as the disturbance of peatland may release stored carbon, leading to a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this crucial issue or prove that the overall carbon balance remains beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the requisite consents or processes have been initiated, which casts doubt on the feasibility and lawful implementation of the project.

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

In summary, the division 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 will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are vital to the area’s environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment notably lacks an evaluation of how this lighting will impact visual amenity, landscape character, and the experience of residents and visitors. Given the significance of dark skies to the local identity and the emerging sector of astro-tourism, this omission represents a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of the impacts on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, which are highly sensitive to artificial lighting. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including disorientation and increased collision risk, have not been addressed.

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

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

determination.

From a policy standpoint, the absence of these assessments conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

In summary, the complete lack of assessment concerning dark skies and nocturnal wildlife creates a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and unsuitable for a lawful determination.

TOURISM

The application does not adequately address the tourism impacts that are crucial to the economy of the Isle of Lewis. With tourism reliant on the area's wild coastline, unspoiled landscapes, dark skies, and sense of remoteness, the application's acknowledgment that 86% of visitors are attracted by scenery is insufficient. There is no quantified assessment of how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for up to 16% of the island's economy. However, the application fails to model the potential impact of industrialising the seascape and degrading environmental quality on Tourism Gross Value Added and the broader economic resilience of the island. Without this analysis, it is impossible to ascertain whether the proposed development would provide a net economic benefit or hinder a vital and expanding sector.

The environmental quality that underpins tourism is not sufficiently considered, particularly regarding the significance of unspoiled landscapes and dark skies for visitor experience, as well as for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a considerable gap in understanding the impacts on a growing segment of the local economy.

For an island community with limited economic diversification, the neglect to assess the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, as required by the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the requirement for net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency results in a substantial evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a profound inadequacy in meeting the standards of sustainable development, as established by statutory duties and national policy. 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 highlighted. However, this application is now under a more rigorous policy framework, which places greater emphasis on biodiversity, peatland preservation, landscape integrity, and the well-being of communities.

A complete and trustworthy evidential foundation for determining this application is lacking. There are significant gaps in the baseline data, the use of an undefined design envelope, and a reliance on unspecified mitigation measures. Moreover, crucial impact pathways, including those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, which hampers a thorough understanding of potential significant effects or residual impacts.

There are evident procedural shortcomings as well. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment is a notable omission. These shortcomings inhibit the competent authority from properly evaluating impacts on community well-being, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal is in direct opposition to the National Planning Framework 4. It fails to illustrate the protection of biodiversity, natural landscapes, and cultural heritage, does not demonstrate that health and well-being impacts are acceptable, and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would lead to substantial and irreversible alterations to a

particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and impacts on tourism are all permanent consequences that cannot be mitigated to an acceptable degree.

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

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

Additional Comments

I object to the N4 offshore wind farm for all the reasons outlined in this email. In particular, I object to the lack of true community engagement and community empowerment. The significant opposition to the N4 development by residents is being ignored. This project will cause harm to the coastal environment, the dark skies and the cultural significance of the current environment to the residents. I don't believe that the true impact on the onshore land has been assessed. I strongly object to the size and scale of this project.

I formally object to application reference: MD-00011742 and MD-00011743 - Spiorad na Mara Limited - Spiorad na Mara Offshore Wind Farm - Isle of Lewis.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 58A379F6

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies across various dimensions, including material planning, environmental, cultural, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

The application lacks a sufficient evidential basis for a lawful determination. Important environmental data is absent, with baseline information being both limited and inconsistent. Additionally, critical elements of the proposal are not clearly defined. The flexible design framework employed does not allow for a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures hampers any evaluation of their effectiveness. Consequently, the submitted documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, while assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial conflicts with policy have been identified. The proposal 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. It has not demonstrated compliance with national requirements aimed at safeguarding biodiversity, climate considerations, and environmental integrity. These policy conflicts directly affect the statutory tests required for consent and compromise the competent authority's ability to determine that the development meets acceptable policy standards.

The unprecedented scale of the proposal poses significant challenges, as large turbines are to be situated near the shoreline, raising serious concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings and lacks a complete, transparent, and reliable evaluation of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the integrity of the assessment, making it impossible for both the public and the competent authority to grasp the true extent of environmental impacts that may arise from the development as ultimately constructed.

Additionally, the application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental damage will be managed later hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This postponement of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation strategies be clearly established prior to decision-making.

Furthermore, there are notable evidential inadequacies, including lapses in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where claims of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not fulfil the evidential requirements set forth under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, specifically concerning biodiversity protection and environmental integrity, as it cannot verify that impacts have been thoroughly assessed or that appropriate safeguards have been established.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These deficiencies obstruct a lawful and thorough assessment of environmental effects, rendering the competent authority incapable of making a well-informed determination based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a detailed comparison of realistic alternatives based on their environmental impacts, the submission merely recounts the project's development

history. This narrative approach does not convincingly show that less harmful options have been identified, evaluated, and chosen over more damaging alternatives.

There is a notable absence of transparent comparisons regarding alternative offshore sites, development scales, or design configurations. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis raises significant concerns about whether the proposed location is indeed the least damaging option available.

This inadequacy extends to the evaluation of cable routing and landfall options, where there is insufficient evidence that alternative paths have been adequately considered to prevent or lessen impacts on sensitive areas. These include culturally and spiritually significant sites such as Barvas Cemetery. The failure to implement a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation through design has not been effectively employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a significant deviation from the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal aligns with sustainable practices or complies with relevant policies.

From a policy standpoint, this shortfall undermines adherence to the National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a systematic and comparative assessment is a critical deficiency that leads to the conclusion that the application has not been sufficiently evaluated and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is critically flawed and fails to deliver a thorough and trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is not only biologically active but also highly sensitive, yet the baseline data is insufficient and the methodologies used do not adequately capture species presence, behaviour, and habitat use. Consequently, the evaluation lacks a solid evidential basis for determining impacts.

A significant oversight concerns otters, which are classified as a European Protected Species. The application inadequately acknowledges their active use of coastal regions for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential impacts of construction disturbance, noise, and

increased activity have not been sufficiently analysed. This flaw undermines any conclusions about the absence of significant effects on this species.

The assessment of basking sharks also exhibits critical deficiencies, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence, particularly when juxtaposed with established land-based observations that indicate frequent usage of these waters. The failure to integrate or adequately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions.

These methodological shortcomings mean that the assertions of negligible or non-significant effects are grounded in assumptions rather than solid evidence. The lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment regime or the National Planning Framework 4, as the assessment of protected species has not been executed properly. The uncertainty introduced by these deficiencies precludes the ability to rule out adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of this, granting consent would be unlawful.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues impede a thorough evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant evidence gaps and internal contradictions that cast doubt on its conclusions. It is situated in an area of the west coast of the Isle of Lewis that is critical for internationally important seabird populations, many of which are already experiencing declines. The application does not adequately demonstrate that these species will not be adversely affected, despite their presence in key foraging areas and migratory routes. There is a lack of robust evaluation regarding displacement, collision risk, or habitat loss associated with the development.

Notably, a contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment fails to substantiate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will

remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling creates uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces another significant risk, effectively acting as a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion that would support the granting of consent. Additionally, these deficiencies demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In conclusion, the assessment's reliability is undermined by internal inconsistencies, methodological inadequacies, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements needed for a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to community identity and cultural heritage is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a simplified view, treating heritage as a collection of static assets rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use, significance, and the implications of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

The assessment further neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing connection between the community

and the coastal environment. These elements are essential to the area's identity but are completely excluded from the evaluation, representing a considerable oversight. Without acknowledging these factors, the cultural impact of the proposed development cannot be accurately assessed.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People, yet no process of Free, Prior and Informed Consent has been pursued. This lack of meaningful engagement compromises the assessment's credibility and fails to adhere to recognised principles of participation in decisions that impact cultural and environmental interests.

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

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, coupled with the failure to recognise living cultural practices, represents a clear deviation from established policy requirements.

Collectively, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not present a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of transparency represents a significant evidential gap that hinders both public understanding and the competent authority's evaluation of social risks identified in the developer's research.

Residents are already reporting measurable stress, anxiety, and concern as a direct result of the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are not speculative in nature. However, the withholding of the complete assessment limits scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with references to "cultural loss" appearing in the developer's own findings. Despite this recognition, the main application has not fully integrated these impacts or assigned them the appropriate weight. The absence of the

full Social Impact Assessment conceals the true social and human costs associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is critical for developments of this magnitude, particularly when they may affect community character and functioning. The failure to provide the complete dataset means the application does not offer a thorough evidential basis to assess the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet the evidence available suggests existing adverse effects that have not been adequately disclosed. Without the complete assessment, it is impossible to confirm compliance with this policy.

The procedural implications of this non-disclosure are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a material shortcoming in the application, failing to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, alongside documented adverse impacts, renders the assessment both incomplete and unreliable. This reality prevents 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, landscape, and seascape is significantly lacking, failing to accurately capture the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon and its undeveloped nature, which contributes to a strong sense of remoteness. The planned large-scale turbines, situated close to the shoreline, would impose a continuous industrial presence, fundamentally altering this unique character and leading to a permanent transformation of the landscape.

The visual change represented in the application is not sufficiently detailed. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic locations, and popular coastal sites. This dominance would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially

concerning significant cultural heritage sites and high-value landscapes. This limitation raises the possibility that the visual impact has been understated, thus questioning the reliability of the assessment.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage adequately. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape, sharing visual and spatial connections to the Atlantic horizon. The assessment fails to consider these sites as interdependent assets, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape threatens to sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This issue is not limited to visual impacts but also encompasses broader cultural and spatial damages, which the application has not properly addressed.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural spaces and historic assets. The proposed scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further challenges any claims of policy adherence.

Ultimately, the impacts identified are not capable of being effectively mitigated. Due to the turbines' scale, height, and proximity, their presence will be dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, beyond the possibility of being lessened to acceptable levels through mitigation efforts.

In conclusion, the assessment does not accurately depict the scale of the impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and confirm that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and vital habitats that are sensitive to sediment disturbance and contamination. However, the proposal fails to adequately address construction and pollution risks associated with substantial seabed preparation and installation works within a high-energy Atlantic environment. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will only be developed post-consent, which prevents any meaningful assessment of their adequacy or effectiveness.

This lack of defined future measures is alarming, especially given the known risks such as sediment mobilisation and potential chemical or oil spills acknowledged in the application. Nonetheless, it provides insufficient detail on the strategies for preventing,

controlling, or monitoring these risks. Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbances and cable installation. Without robust modelling and well-defined management strategies, it is impossible to gauge the extent, duration, or ecological consequences of these impacts, which could adversely affect already sensitive marine species and habitats.

The absence of thorough emergency response procedures adds another layer of concern. By postponing contingency planning until after consent is granted, the application precludes the evaluation of whether adequate safeguards are in place for addressing potential pollution incidents. This approach introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, deferring critical environmental safeguards conflicts with the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation measures must be evaluated prior to consent, and the lack of such information renders a lawful determination unachievable. Additionally, the application does not demonstrate compliance with the essential policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, inadequate management plans, and uncertainty about potential impacts leads to a materially deficient assessment. These deficiencies 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 fisheries and marine life presented in this application is inadequate and fails to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem alongside a vital fishing industry, yet the application does not convincingly demonstrate that these uses and habitats can be preserved without causing considerable disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is no supporting evidence that alternative fishing grounds are not only available but also accessible and capable of absorbing additional pressure. This critical gap poses a risk of overfishing in other areas, which could lead to detrimental economic consequences for the local fishing fleet. In the absence of a clear, evidence-based assessment, the effects on fisheries and the livelihoods they support remain unclear.

Moreover, the proposal brings with it considerable risks to marine species, particularly due to the underwater noise associated with construction. The use of high-energy hammer piling over an extended period is likely to create disturbances over large distances, impacting species such as dolphins. The anticipated disturbance to a

significant portion of the local bottlenose dolphin population raises urgent concerns, yet these effects are minimised in the application without sufficient supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious issues regarding compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial evaluation of dark skies and nocturnal wildlife, which constitutes a significant oversight. The West Lewis coastline is noted for its exceptionally dark skies, integral to the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting will produce a continuous and intrusive “wall of light” effect on the western horizon, fundamentally transforming the night-time environment.

Importantly, the proposal fails to assess the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This is especially concerning due to the relevance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The absence of this assessment results in a considerable gap in the overall environmental and landscape evaluation.

Moreover, the application does not examine the consequences of artificial lighting on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial light due to phototaxis, which increases disorientation and collision risks. The lack of a lighting impact assessment or a phototaxis study means that the proposal does not adequately evaluate how aviation lighting may endanger these species or contribute to mortality.

This gap is exacerbated by the use of daytime survey data for the ornithological assessment, which fails to account for nocturnal activities and related risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data further complicates the understanding of ecological impacts.

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

From a policy standpoint, this oversight contradicts National Planning Framework 4, particularly concerning the protection of natural places and the quality of the environment. Additionally, it diminishes the overall assessment of landscape and seascape impacts, as the character of night-time is an essential component of the environment.

In summary, the complete lack of assessment regarding dark skies and nocturnal wildlife reveals a substantial evidential gap. The deficiency in baseline data, impact modelling, and species-specific analysis renders the application insufficient and unable to support a lawful determination.

TOURISM

The evaluation of tourism impacts within the application is significantly inadequate, neglecting to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. The area's tourism thrives on its wild coastline, almost untouched landscapes, dark skies, and the feeling of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviours, or the overall economic contributions made by tourism.

Tourism in the region has experienced notable growth, escalating from £65 million in 2017 to over £81.5 million, which sustains more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not explore how the anticipated industrialisation of the seascape and degradation of environmental quality might affect the Tourism Gross Value Added or the resilience of the broader economy. Without this critical assessment, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise an established and expanding sector.

Moreover, the analysis does not adequately address the significance of environmental quality for tourism, particularly regarding unspoiled landscapes and dark skies, which are essential for visitor experiences and burgeoning markets like nature-based tourism

and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, leaving a notable absence in understanding its effects on a recognised and growing segment of the local economy.

In an island community with limited economic diversity, the oversight regarding tourism impacts has broader consequences for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefits. It is at odds with strategic objectives that highlight tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic ramifications of the proposal.

Overall, the inability to quantify tourism impacts, analyse the environmental factors influencing visitor behaviour, and recognise the economic dependency of the island culminates in a substantial evidential gap. This gap hinders a thorough assessment of economic implications and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This proposal brings forth the same core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented under an enhanced policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidence provided for determination. The application lacks a complete baseline data set, utilises an undefined design envelope, and depends on unspecified mitigation measures. Key impact pathways, such as nocturnal wildlife, full onshore infrastructure, and tourism effects, are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

Moreover, procedural shortcomings are evident. The failure to conduct a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact Assessment constitutes a material omission. These deficiencies impede the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Conflicts with the National Planning Framework 4 are apparent in the proposal. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural

heritage. Health and wellbeing impacts are not shown to be acceptable, and the absence of tourism impact modelling precludes any evidence of a net economic benefit. The cumulative impact of both offshore and onshore elements has not been assessed properly, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties surrounding environmental risks that could prove significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding a lawful conclusion on the acceptability of impacts.

The proposal would lead to considerable and irreversible alterations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and impacts on tourism would yield permanent consequences that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively inadequate for determination. The vast information deficiencies, combined with policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to compel 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

I would like to submit my strong opposition to the proposed wind farm development both onshore on the island Isle of Lewis and the surrounding seas offshore. This is on the grounds of the negative, destructive, impact which it will have to the local environment, the local community, the health and wellbeing of the local people and the willful destruction of the landscape, culture and way of life for the local people and the impact which it will have on future generations to come. There seems to be absolutely no care or consideration being given to the local people. The Islands are an unspoilt area, for wildlife, marine life and natural beauty- the very reason which brings visitors from all over the world. If these plans go ahead, the Islands will be ruined for future generations of local people. I want to voice my strong objection. These plans are being submitted for corporate greed with no care for the damage which will be caused to the local environment and long term damage to the health and wellbeing of the local people.

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: 44AF600E

