

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 objection arises from an examination of the Environmental Impact Assessment Report and other relevant documents, revealing serious deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. There are fundamental issues regarding the scale, design, and proximity of the proposal in relation to statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation for a lawful decision. There is a lack of critical environmental data, limited and inconsistent baseline information, and many aspects of the proposal remain undefined. The flexible design framework complicates the assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially regarding biodiversity, natural areas, cultural heritage, and public health. It does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine if the development aligns with policy requirements.

The proposal's scale is unprecedented for this area, with large turbines located near the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental repercussions. In light of the insufficient information, reliance on unclear mitigation strategies, evidential shortcomings, and clear policy non-compliance, it is apparent that the application is incomplete and does not support a lawful decision. Therefore, the precautionary principle should be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to provide a reliable account of the anticipated environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to

specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity undermines the integrity of the assessment and means that the reported impacts may not accurately reflect the final development, thus preventing both the public and the competent authority from fully understanding the actual environmental effects.

The application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the basis that environmental harm will be mitigated at a later stage hinders 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 clear establishment of likely significant effects and mitigation prior to determination.

There are substantial evidential deficiencies in the report, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These shortcomings result in uncertainties regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that are incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated under the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This necessitates the application of the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not comply with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, absence of specified mitigation strategies, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude a lawful and robust assessment of environmental effects, meaning that the competent authority is not adequately equipped to make a determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a proper assessment of alternatives, which does not meet the required standards of the Environmental Impact Assessment regime. Instead of a structured comparison of realistic alternatives based on their environmental effects, the application offers a narrative of project development. This method does not adequately show that less harmful options have been identified, assessed, and chosen over more damaging alternatives.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, scales of development, or design configurations. The application does not convincingly demonstrate that the developer has considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The sensitivity of the West Lewis coastline is significant, and the choice of siting is crucial in assessing impact. The failure to analyse this means there is no basis to conclude that the proposed location is the least damaging option.

Similar shortcomings are evident in the assessment of cable routing and landfall, as there is insufficient evidence that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually important areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that the design did not incorporate mitigation by design, opting instead for reliance on post-design measures.

Consequently, the application does not show that environmental harm has been reduced through site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, preventing the competent authority from determining if there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, it cannot be affirmed that the proposal is sustainable or compliant with policy.

From a policy standpoint, this lack of assessment undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to provide a structured and comparative analysis is a significant omission that leads to the conclusion that the application has not been properly assessed and is not suitable for a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

The assessment of basking sharks also shows significant flaws. The reliance on aerial surveys creates a notable detection bias, particularly in Atlantic conditions, likely

leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate these waters are frequently used by basking sharks. By not incorporating or properly considering this data, the assessment presents an incomplete baseline and diminishes the reliability of its conclusions.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally unreliable due to significant internal inconsistencies and methodological weaknesses. Key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which are critical for internationally important seabird populations that are already in decline, have not been adequately evaluated. The application fails to demonstrate that these species will not be adversely affected, particularly concerning displacement, collision risk, and habitat loss.

A major contradiction arises in the developer's conclusions, where they claim there will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which suggests the expectation of significant harm. This inconsistency raises doubts about the reliability of the assessment, implying that the conclusions drawn are not underpinned by sound evidence.

Moreover, the assessment lacks adequate evidence regarding seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of the feeding grounds has not been thoroughly recognised, and the modelling approaches used introduce further uncertainty, especially for species in severe decline, such as Kittiwakes and Fulmars. The methodologies are likely to underestimate mortality, given the incomplete baseline data and the limited understanding of behavioural responses.

The proposed siting of turbines within a recognised migratory corridor poses an additional and significant threat, creating a barrier within a primary flight path that many species use while travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential standard necessary to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and modelling limitations, means that the requisite standard of beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle and means a lawful conclusion in favour of consent cannot be reached.

Additionally, these deficiencies indicate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected directly contradicts national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. However, the assessment of cultural heritage and community identity in the current application is fundamentally inadequate. It adopts a reductive view, treating heritage merely as a collection of isolated and static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are essential as active places of burial and spiritual practice. Unfortunately, the assessment reduces these vital sites to static features, ignoring their continued use and meaning, as well as the impact of development on their settings. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Furthermore, there is a notable absence of consideration for intangible cultural heritage, including the Gaelic language, local traditions, and the long-standing connection between the community and the coastal environment. These elements are central to the area's identity yet remain entirely overlooked in the assessment, representing a significant gap. Without their inclusion, the cultural impact of the development cannot be fully understood.

Community rights and engagement are also significant concerns. The Gaelic-speaking

population embodies a distinct cultural identity, akin to that of Indigenous Peoples, yet the application lacks a process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the assessment's legitimacy and neglects established principles of participation in decisions affecting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure, as mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

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

Collectively, the lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application does not provide a sufficient foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Moreover, there is substantial evidence indicating that the proposal threatens community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these crucial impacts have not been adequately integrated into the main application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

The absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is vital for developments of this magnitude, especially when community character and functioning may be at stake. The failure to provide the complete dataset prevents the

application from offering a comprehensive evidential basis to assess the balance between benefits and harm.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts does not adequately reflect the significant changes that would occur, nor does it consider the sensitivity of the environment. The proposed large-scale turbines, situated in close proximity to the shoreline, would create a continuous and dominant industrial presence that fundamentally alters the character of the landscape, leading to a permanent and irreversible transformation.

Furthermore, the application does not sufficiently represent the magnitude of the visual changes that would arise. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This dominance would directly impact visual amenity and erode the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within the context of such a sensitive landscape.

There are significant methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This introduces the possibility that the magnitude of visual impact has been understated, which undermines the reliability of the assessment.

Additionally, the assessment neglects to address the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that

is visually and spatially linked to the Atlantic horizon. By treating these heritage assets in isolation, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these vital relationships, altering 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 more extensive cultural and spatial harm that has not been adequately addressed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, specifically regarding the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the requirement to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of compliance with policy.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would result in a presence that is dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is lacking in completeness and fails to provide the necessary detail to evaluate potential environmental effects adequately. The proposal entails extensive seabed preparation and installation operations within a high-energy Atlantic setting, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be formulated after consent, which hinders any thorough evaluation of their sufficiency or effectiveness.

This dependence on unspecified future actions raises significant concerns, particularly given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to disturbances from sediment and contamination. Although the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, managed, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes that may

result from seabed disturbances and cable installations. In the absence of reliable modelling and clearly defined management approaches, it remains impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to potential effects on marine species and habitats that have already been recognised as sensitive within the broader assessment.

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

From a regulatory viewpoint, the postponement of essential environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent is issued, and without this critical information, a lawful determination cannot occur. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially inadequate. These weaknesses obstruct a thorough evaluation of construction and pollution risks, further reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the application is lacking in its evaluation of fisheries and marine life, failing to adequately address the ecological and socio-economic impacts. The fishing industry is active in the waters off the West Lewis coast, which also supports a diverse marine ecosystem. However, the application does not provide evidence that these habitats and activities can be protected or maintained without significant disruption.

A key concern is the assumption that fishing can be displaced without adverse effects. There is no evidence presented to show that alternative fishing grounds exist or can support the increased pressure from displaced activities. This significant omission raises the risk of overfishing in other areas, which could have wider economic implications for the local fishing fleet. Without a clear and evidence-based analysis, the potential impacts on fisheries and local livelihoods remain unclear.

The proposal also poses serious risks to marine species, particularly due to underwater noise from construction activities. High-energy hammer piling over prolonged periods is likely to disturb marine life over large distances, including species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application minimises these impacts and lacks

sufficient supporting evidence.

There is an inconsistency within the application regarding the need for licences for any harm to European Protected Species. While acknowledging this necessity, the application also describes the impacts as negligible, which undermines the assessment's credibility. This contradiction raises compliance issues with the Habitats Regulations, especially when potential harm that requires legal authorisation is anticipated.

Cumulative impacts from habitat disturbance, noise, and fishing displacement have not been adequately considered in the assessment. Without an in-depth evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

Excluding or postponing the assessment of onshore impacts obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process requires that all parts of a project be considered together, but separating offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully recognised.

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

measures, creating a notable gap in biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The application fails to include any evaluation of nocturnal wildlife, which is a serious oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be particularly sensitive to artificial lighting. Their behaviour, affected by phototaxis, can lead to disorientation and increased risk of collision. The lack of a lighting impact assessment or a phototaxis study means there is no understanding of how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

Additionally, the application does not consider the impact of the proposed permanent red aviation lighting on visual amenity, landscape character, or the overall experience for both residents and visitors. This is particularly concerning given the significance of dark skies to the region's identity and its tourism potential, particularly in relation to astro-tourism. The introduction of lighting visible over long distances would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The reliance on daytime survey data in the ornithological assessment is problematic, as it overlooks the nocturnal activity of species such as Kittiwakes, which may forage or migrate at night. This lack of site-specific night-time data leads to a crucial gap in understanding the ecological impacts of the proposal.

Moreover, without assessing the impacts on nocturnal wildlife and dark skies, it remains impossible to establish whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate that adverse

effects are unlikely cannot be satisfied. This situation invokes the precautionary principle and hinders a lawful determination of the proposal.

From a policy standpoint, this omission contradicts National Planning Framework 4, which relates to the protection of natural areas and the quality of the environment. It also detracts from the comprehensive evaluation of landscape and seascape impacts, as the character of night-time settings is an essential component of the overall environment.

Overall, the lack of assessment regarding dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and specific species analysis renders the application incomplete and insufficient for 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 Spiorad na Mara Offshore Wind Farm proposal exemplifies a significant shortfall in meeting the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application revisits the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Now, it is being evaluated under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

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

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The necessary evidential

threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

This intended industrialisation of the Isle of Lewis and to turn the Hebrides into a wind factory without community consent and/or support (and without satisfactory assurance that the community would receive any tangible benefit), would result in nothing less than a modern day Clearance. These islands are more than just a resource to be plundered by those who seek profit.

We have few places left in Scotland and indeed the world that are as untouched and special as the landscapes and oceans of the Hebrides. In an increasingly industrialised world, are these places not worth protecting?

It is iniquitous that this 'green energy' project is proposed for an area where many suffer from fuel poverty, but the same people will still face some the highest fuel prices in the country while these turbines and the associated industry will destroy their environment and communities.

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: C2CC0228

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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.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to adequately meet the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. There is a significant deficiency in the assessment of marine ecology and protected species, which provides

an unreliable understanding of ecological receptors within the sensitive West Lewis coastal environment. The methodologies used are inadequate and do not sufficiently capture crucial aspects of species presence, behaviour, and habitat use, thereby undermining the evidential basis for evaluating potential impacts.

One critical shortcoming is the treatment of otters, a European Protected Species. The application does not properly recognise or assess their active use of coastal areas for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential effects from construction disturbance, noise, and increased activity. Such omissions raise significant doubts about the conclusions drawn regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks suffers from methodological flaws, notably the reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider these observations leads to an incomplete baseline and undermines the reliability of the conclusions presented.

The methodological limitations in the assessment result in conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. Furthermore, the lack of sufficient baseline data hinders any meaningful assessment of cumulative and indirect impacts, including variations over seasons and interactions within the wider ecosystem. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

When considering these factors, the overall assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These deficiencies prevent a thorough evaluation of impacts on marine ecology and protected species, contributing to the conclusion that the application lacks a solid evidential foundation. In light of the uncertainties introduced, consent for the application cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is deeply flawed, characterised by significant internal inconsistencies and a lack of robust evidence, which undermines 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 adequately demonstrate that these species will not suffer adverse effects. The proposed site lies within critical foraging areas and migratory pathways, yet the assessment neglects to thoroughly evaluate the risks of displacement, collision, and habitat loss.

Furthermore, a fundamental contradiction arises within the application: the developer

asserts that no significant adverse effects will occur while simultaneously presenting a case for Habitats Regulations derogation, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and suggests that its conclusions are not substantiated by the evidence provided. The assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is insufficiently considered, and the reliance on modelling methods introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

Additionally, the siting of turbines within a recognised migratory corridor poses a further significant risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential effects on species with small global populations been considered. From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

The deficiencies in the assessment also indicate a failure to comply with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy. In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, all of which obstruct a thorough evaluation of impacts and affirm that the application does not fulfil the statutory requirements for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the proposed development's impact on cultural heritage and community identity is fundamentally flawed. It fails to recognise the West Lewis coastline as a dynamic cultural landscape, in which environment, language, tradition, and community are intertwined. The application adopts a simplistic view of heritage, treating it as a collection of separate, unchanging assets, rather than appreciating their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual activities; however, the assessment regards them merely as static features. This oversight neglects their continued use and the potential impacts of development on their settings, leading to an incomplete understanding of the cultural

ramifications and disregarding their importance in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language, local traditions, and the established relationship between the community and the coastal environment. These aspects are essential to the area's identity but are conspicuously missing from the assessment, which is a substantial shortfall. Without the inclusion of these elements, the cultural implications of the development cannot be accurately assessed.

Concerns also arise regarding the rights of the community and the level of engagement involved. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of an Indigenous People, has not been afforded the necessary process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the credibility of the assessment and falls short of recognised standards for participation in decisions that affect cultural and environmental interests.

A significant procedural deficiency is the absence of an Island Communities Impact Assessment, a requirement mandated by the Islands (Scotland) Act 2018. The omission of this assessment inhibits the competent authority from fulfilling its legal responsibilities to assess the social, cultural, and economic impacts on the island community. This alone renders any determination regarding the application legally insufficient.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, especially concerning the preservation of historic assets and locations. The neglect to account for both tangible and intangible heritage, along with the failure to acknowledge ongoing cultural practices, signifies a substantial divergence from established policy obligations.

In summary, the shortcomings in assessing living heritage, intangible cultural value, community rights, and adherence to statutory requirements create a considerable evidential void. The cultural effects of the development remain inadequately evaluated, and the application does not present a robust foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full Social Impact Assessment has not been published, leading to a significant gap in evidence. This lack of transparency hinders both the public and the competent authority from fully understanding the social risks identified by the developer's own research. Although summaries reveal that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, the absence of the complete assessment restricts proper scrutiny of these findings.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these impacts have not been adequately addressed in the main application, nor given the appropriate weight

they deserve. This withholding of information obscures the actual human and social cost of the development.

The significance of a thorough understanding of social, economic, and health impacts cannot be overstated, especially for developments of this magnitude that may influence community character and functioning. The lack of comprehensive data compromises the Environmental Impact Assessment process and the ability to properly weigh the benefits against the harms of the proposal.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 regarding health and wellbeing. The evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, it cannot be shown that the development will support positive health outcomes and avoid harm.

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

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of current adverse impacts, leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and supports the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Furthermore, the application inadequately captures the scale of visual change that would result from the turbines. Their size and proximity would lead to domination of views from residential areas, historic sites, and prominent coastal locations, thereby negatively affecting visual amenity and undermining the defining characteristics of naturalness and remoteness. The assessment lacks an accurate portrayal of the impacts and their significance within this sensitive landscape context.

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

of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks lacks completeness, failing to provide the necessary detail to evaluate potential environmental effects. The project entails significant seabed preparation and installation in a high-energy Atlantic setting, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures to be established after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures raises particular concerns due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and

contamination. The application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills but lacks adequate detail on how these issues will be prevented, controlled, or monitored.

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

The situation is further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are available to address pollution incidents. This introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant likely effects and mitigation must be evaluated before consent is granted, and the lack of such information precludes a lawful determination. The application also fails to 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 surrounding potential impacts collectively render the assessment materially inadequate. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion 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.

DARK SKIES AND NOCTURNAL WILDLIFE

The failure to assess dark skies and nocturnal wildlife represents a significant oversight 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 potential. The introduction of permanent red aviation lighting will create a pervasive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

Moreover, the application lacks an evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the integral role of dark skies in the area's identity and in emerging sectors like astro-tourism, this omission is particularly concerning. The absence of such assessments

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

Equally troubling is the lack of analysis regarding impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risk. The application does not include any assessment of lighting impacts or phototaxis studies, resulting in a failure to understand how aviation lighting may affect these species or contribute to increased mortality.

This issue is exacerbated by the dependence on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or 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 shortfall in understanding the ecological impacts.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the protection of natural places and environmental quality. They also diminish the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

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

Tourism has experienced notable growth, rising from £65 million in 2017 to over £81.5 million, sustaining more than 1,000 jobs and representing up to 16% of the island's economy. In spite of this progress, the application does not simulate how the industrialisation of the seascape and the degradation of environmental quality could

affect Tourism Gross Value Added or the broader economic resilience. Without such analysis, it remains unclear whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

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

In an island community characterised by limited economic diversification, the lack of an assessment of tourism impacts carries broader implications for employment, local businesses, and community sustainability. The failure to produce a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been adequately evaluated, as stipulated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the necessity to exhibit net benefit. It also contradicts strategic objectives that designate tourism as a priority growth sector, failing to present sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm indicates a significant shortfall in meeting the principles of sustainable development as outlined by statutory duties and national policy. It echoes the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There are substantial gaps in the evidential basis provided for the proposal. Notably, there is a reliance on an undefined design envelope, incomplete baseline data, unspecified mitigation measures, and key impact pathways that have been overlooked, such as those concerning nocturnal wildlife, the entirety of the onshore infrastructure, and the effects on tourism. This leads to an Environmental Impact Assessment that is insufficient, failing to offer a comprehensive understanding of the potential significant effects or residual impacts.

Furthermore, the proposal displays evident procedural shortcomings. The lack of a

compliant Island Communities Impact Assessment violates statutory obligations set forth by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment is a significant deficiency. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal is at odds with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. It fails to establish that the health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact analysis. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly evaluated, which clouds the understanding of impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties surrounding environmental risks remain, with incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, which in some aspects are inconsistent with each other. The evidence threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstruct a lawful and evidence-based decision-making process. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm be denied in its entirety.

Additional Comments

It's a disgrace to even conceive of this eyesore considering wave turbine alternatives.

This is one of the rarest of areas, unspoilt. The idea of putting these monstrosities in an area of outstanding natural beauty can only have been conceived by a bean counter in a suit.

You should be ashamed.

As a surfer, you will ruin conditions on the coast, I am disgusted by this. Adding pollution to an already threatened marine environment.

There are no words to describe how poor this is. Just don't do it.

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: FCE78334

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and related documents, which reveal significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the wind farm, particularly regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful decision. Critical environmental data is notably absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The application's flexible design framework obscures the understanding of potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed view of the impacts on the environment, culture, or community, and assertions of negligible or non-significant effects lack robust support.

Furthermore, there are significant policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment framework, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable under policy standards.

The unprecedented scale of the proposal, with large turbines placed near the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy violations indicate that the application is incomplete and unable to support a lawful determination. In light of these issues, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application for the proposed development is significantly flawed due to its reliance on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. As a result, the assessment's integrity is compromised, leaving both the public and the competent authority without a clear understanding of the potential environmental impacts that may arise from the actual construction.

Furthermore, the Environmental Impact Assessment Report does not adequately define mitigation measures, monitoring strategies, or management plans, as these are proposed to be established at a later stage. Seeking consent under these conditions means that there can be no meaningful evaluation of the effectiveness of these measures, nor can the residual impacts be properly assessed. This approach is procedurally unacceptable and goes against the fundamental objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies be clearly outlined before any determination is made.

There are notable evidential shortcomings present, including insufficient baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. Such deficiencies lead to uncertainties concerning the scale and significance of the impacts, particularly when conclusions regarding negligible or non-significant effects are drawn without robust data to support them. The lack of comprehensive information hinders a clear understanding of cumulative and worst-case scenarios, creating scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application fails to meet the evidential standards required under the Habitats Regulations, which are necessary to exclude adverse effects beyond reasonable scientific doubt. This situation activates the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to the National Planning Framework 4, particularly in relation to the safeguarding of biodiversity and environmental integrity, as it cannot confirm that all impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and the existence of gaps in baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, ultimately leaving the competent authority without the necessary information to make an informed decision on the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a thorough and transparent assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic alternatives based on their

environmental impacts, it provides a narrative of project evolution that does not adequately demonstrate that less harmful options have been identified or selected over more damaging solutions.

In particular, there is no evidence of a proper evaluation of alternative offshore locations, development scales, or design configurations. The absence of an analysis regarding the potential to locate turbines further offshore is especially concerning, as this could significantly reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining environmental impact, the lack of such assessment prevents a conclusion that the proposed siting is the least damaging option available.

These inadequacies extend to the routing of cables and the assessment of landfall, where there is insufficient exploration of alternative routes to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear strategy for avoidance, combined with a lack of comparative analysis, indicates that the application has not effectively applied mitigation by design, instead relying on post-design measures.

As a consequence, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy, leaving the competent authority unable to determine whether less harmful and more suitable alternatives exist. Without a robust assessment of alternatives, it is impossible to conclude that the proposal is sustainable or compliant with policy.

From a policy perspective, this lack of structured assessment undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The failure to provide a comprehensive and comparative analysis is a significant omission that contributes to the conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development fails to provide a comprehensive and reliable assessment of marine ecology and protected species 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 used do not adequately account for species presence, behaviour, and habitat use. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A significant shortcoming is found in the consideration of otters, which are a European Protected Species. The application does not sufficiently recognise or assess their active use of coastal areas for foraging and movement. By neglecting to evaluate their core foraging range and behavioural patterns, the assessment overlooks the potential effects of construction disturbances, noise, and increased activity, ultimately

undermining the conclusions drawn regarding the absence of significant impacts on this species.

Further shortcomings are evident in the assessment of basking sharks. 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 compared to established land-based observations that indicate their frequent use of the waters in question. The failure to include or adequately consider such data results in an incomplete understanding of the baseline, which in turn diminishes the reliability of the conclusions reached.

These methodological weaknesses mean that the determination of negligible or non-significant effects relies on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns regarding the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty generated by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In such circumstances, granting consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application is situated within key foraging areas and migratory pathways crucial for internationally important seabird populations along the west coast of the Isle of Lewis, many of which are in decline. However, the ornithological assessment fails to provide sufficient evidence demonstrating that these species will not be adversely affected. The evaluation does not adequately address the implications of displacement, collision risk, or habitat loss, which raises significant concerns.

There exists a fundamental contradiction within the application. The developer concludes that there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence presented.

Furthermore, the assessment does not convincingly show 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 thoroughly recognised, and the reliance on modelling approaches generates uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies 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 in support of consent.

Moreover, the deficiencies highlighted constitute a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These deficiencies obstruct a thorough evaluation of impacts and support the conclusion that the application does not meet the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity lacks depth and fails to acknowledge the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising heritage as an evolving aspect of community life, the application adopts a reductive approach that treats it as a collection of static, isolated assets.

A notable shortcoming is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practices, yet the assessment categorises them merely as static features. This oversight neglects their ongoing use and significance, as well as the impact that development could have on their surroundings. As a result, the evaluation of cultural effects remains incomplete and fails to consider their importance within community life.

Additionally, the assessment overlooks intangible cultural heritage, including the

Gaelic language and local traditions, which are integral to the area's identity. The absence of these elements signifies a critical omission, as understanding the cultural impact of the development requires consideration of these intangible factors.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and does not adhere to established principles of participation in decisions impacting cultural and environmental interests.

Furthermore, 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. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic implications for the island community, rendering a lawful determination unachievable.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, particularly regarding the safeguarding of historic assets and sites. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, indicates a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Moreover, there is evidence that the proposed development is viewed as a threat to community identity and cohesion, with the term “cultural loss” explicitly mentioned in the developer’s findings. Despite this acknowledgment, these impacts have not been

adequately integrated into the application or given the necessary weight. The non-disclosure of the full Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential for development to promote positive health outcomes and mitigate harm, yet the available evidence highlights existing adverse effects that remain undisclosed. In the absence of the complete assessment, compliance with this policy cannot be validated.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material failure within the application and does not satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the potential impacts on seascape, landscape, and visual elements is significantly lacking and does not adequately reflect the extent of change or the sensitivity of the surrounding environment. The character of the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape.

The application fails to adequately capture the magnitude of visual change expected from the project. Given their scale and proximity, the turbines 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. The assessment inadequately conveys the level of this impact and its significance within such a sensitive landscape.

Methodological concerns arise regarding the selection and presentation of visual

viewpoints in the assessment. There is evidence to suggest that the chosen viewpoints do not fully capture the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the magnitude of visual impact has been understated, thus undermining the reliability of the assessment.

Furthermore, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a broader landscape context that connects them visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to recognise their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and their relationship with the natural horizon. This represents not just a visual impact but a broader cultural and spatial harm that has not been adequately considered in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the protection of natural areas and historic assets. The extent of the proposed changes is incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further calls into question any claims of compliance with policy.

It is also evident that the impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be a dominant and unavoidable feature. The resulting changes are therefore fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is alarmingly incomplete and lacks the detail necessary for a thorough evaluation of likely environmental effects. This project entails significant seabed preparation and installation works within a challenging high-energy Atlantic environment. However, it notably does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that are to be prepared only after consent is granted, which hinders any meaningful assessment of their adequacy or effectiveness.

Particularly troubling is the reliance on undefined future measures, especially considering the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk from sediment disturbance and potential contamination. Although the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide the necessary detail on how these risks will be prevented, controlled, or monitored.

There remains considerable uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential consequences for marine species and habitats that have been identified as sensitive in the broader assessment.

Adding to these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application does not allow for an evaluation of whether adequate safeguards are in place to address pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of crucial environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated prior to granting consent, and without this information, a lawful determination is unattainable. Furthermore, the application does not adequately demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts renders the assessment materially deficient. These shortcomings significantly obstruct a rigorous evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries associated with the proposed development is fundamentally flawed and fails to adequately assess both ecological and socio-economic repercussions. The waters off the West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the application does not sufficiently demonstrate how these vital habitats and activities will be safeguarded from significant disruptions.

One of the major concerns is the presumption that displacing fishing activity can occur without repercussions. The application lacks any substantiation regarding the availability or accessibility of alternative fishing grounds that could absorb the additional pressure. This lack of evidence is critical, as displacement could lead to

overfishing in other areas, with potential adverse economic impacts for the local fishing fleet. The absence of a detailed and evidence-based assessment means that the consequences for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable threats to marine species, especially due to the underwater noise generated during the construction phase. The use of high-energy hammer piling for extended periods is anticipated to create disturbances that could affect marine life over large distances, notably the local bottlenose dolphin population. The application downplays these predicted disturbances, raising concerns that are not sufficiently backed by evidence.

There is also a troubling inconsistency within the application; it acknowledges the necessity of licences for any harm to European Protected Species while simultaneously characterising those impacts as negligible. This contradiction calls into question the integrity of the assessment and raises serious compliance issues regarding the Habitats Regulations, especially when harm is anticipated to a level that would require legal authorisation.

Furthermore, the assessment does not adequately account for cumulative impacts stemming from multiple stressors, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall implications for 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 mitigate unacceptable impacts on marine biodiversity, which ultimately prevents a determination that the proposal is sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a vital carbon store and ecologically sensitive

habitat. The application lacks a thorough evaluation of these impacts, thus hindering a comprehensive understanding of the project's overall environmental footprint.

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This lighting is visible over long distances and significantly impacts the character of the West Lewis coastline, which is known for its exceptionally dark skies. The dark skies are integral to the area's environmental quality, cultural identity, and tourism potential.

Crucially, the assessment does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This lack of consideration is especially concerning given the emerging significance of astro-tourism

in the region. The failure to address these impacts creates a notable gap in the overall environmental and landscape assessment.

Moreover, the application neglects to assess the impacts on nocturnal wildlife. 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 an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species and their mortality risk remain unexamined.

This oversight is further compounded by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity and associated hazards. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data leads to a critical deficit in understanding the ecological impacts of the proposed development.

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

From a policy standpoint, the omission contradicts National Planning Framework 4 regarding the protection of natural spaces and environmental quality. It further undermines the comprehensive evaluation of landscape and seascape impacts, as the night-time character is a vital component of the environment.

In summary, the failure to conduct an 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 unsuitable for a lawful determination.

TOURISM

The assessment of tourism impacts presented in the application is severely lacking and does not consider the economic and social repercussions for a vital sector of the Isle of Lewis's economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by scenery, it fails to provide any quantified evaluation of how large-scale offshore infrastructure could influence visitor numbers, their behaviour, or the overall economic contribution they make.

Tourism has seen substantial growth, escalating from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and deterioration of environmental quality may impact Tourism Gross Value

Added or the broader economic resilience of the area. In the absence of such analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a sector that is both established and expanding.

Additionally, the assessment neglects to account for the significance of environmental quality in sustaining tourism, specifically regarding the value of unspoiled landscapes and dark skies for the visitor experience. The lack of a Dark Skies Assessment further exacerbates this deficiency, resulting in a considerable gap in understanding the potential impacts on a recognised and expanding segment of the local economy, including nature-based tourism and astro-tourism.

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

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

In summary, the inability to quantify tourism impacts, assess environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential void. This gap inhibits a thorough evaluation of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, wherein the extent of industrialisation was deemed unacceptable. Presenting the proposal under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify these concerns.

There are significant deficiencies in the evidential basis provided for the application. Critical gaps exist in baseline data, the design envelope remains undefined, reliance on unspecified mitigation measures is evident, and key impact pathways such as nocturnal wildlife, full onshore infrastructure, and effects on tourism have been omitted. Consequently, the Environmental Impact Assessment is incomplete, which hinders a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are also apparent. The lack of a compliant Island Communities Impact Assessment represents a breach of statutory duty under the Islands (Scotland)

Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material 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.

This proposal is in direct opposition to National Planning Framework 4, failing to demonstrate adequate protection of biodiversity, natural environments, and cultural heritage. It does not provide assurance that health and wellbeing impacts are acceptable and lacks tourism impact modelling to evidence a net economic benefit. Furthermore, the cumulative impact of both offshore and onshore components has not been properly assessed, which obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies in parts. 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 the acceptability of impacts.

The proposal would instigate 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 represent enduring effects that cannot be mitigated to an acceptable standard.

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

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

Additional Comments

Despite being all for renewable energy this proposal is wrong on many levels. Being proposed by a foreign company all profits and benefits will be taken away leaving next to nothing for us islanders who will have to live with it dominating the whole of our island. It will industrialise our culturally and economically fragile island with our any real benefits. It is way to close inshore if it was 20-30+ kilometres where most other "offshore" windfarms are then that would be a different story.

There is no one else and nowhere else like us here in the world. This project would ruin our island economically, culturally and environmentally for the benefit of Canadian shareholders. We don't ask or demand much but please don't take our own future away from us.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1C0D9314

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its supporting documents reveals significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The considerable scale, proximity, and design of the proposal lead to serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis required for a lawful decision. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Key elements of the proposal remain undefined, complicating the assessment of likely significant effects. The flexible design framework further obscures understanding, and the reliance on unspecified mitigation measures prevents any evaluation of their effectiveness. Consequently, the documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by solid evidence.

Moreover, the proposal presents clear and substantive conflicts with existing policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. There is no demonstration that the national requirements to protect biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts challenge the statutory tests for consent and jeopardise the ability of the competent authority to determine the development's acceptability from a policy standpoint.

The unprecedented scale of the proposal raises further alarm, as large turbines are planned to be situated close to the shoreline, raising significant issues relating to landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance indicate that the application is incomplete and cannot sustain a lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and completeness. A flexible Project Design Envelope is employed, lacking firm commitments to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and hampers the ability to consistently apply a worst-case scenario, which is essential for a credible assessment. Consequently, the impacts detailed may not accurately represent those of the development that would eventually be constructed, limiting both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

Moreover, the application places considerable reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans. Seeking consent under these circumstances defers critical information to stages post-consent, making it impossible to evaluate the effectiveness of these measures or assess residual impacts meaningfully. This procedural approach is unacceptable and contradicts the fundamental objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and appropriate mitigations are clarified before any determination can be made.

Evidential shortcomings also permeate the assessment, with notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. Insufficient information precludes a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that fails to meet statutory requirements.

As such, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not align with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it fails to demonstrate that impacts have been comprehensively assessed or that appropriate safeguards are established.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and significant gaps in baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings inhibit a lawful and rigorous evaluation of environmental effects and leave the competent authority without the necessary information to make a well-informed determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is materially inadequate and fails to satisfy the statutory requirements of the Environmental Impact Assessment regime. The application does not provide a structured or reasoned comparison of realistic alternatives based on environmental effects. Instead, it offers a narrative account of

project evolution that does not adequately demonstrate that less harmful options have been properly identified, assessed, and preferred over more damaging solutions.

There is a lack of transparent or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered the option of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. Considering the sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact, the failure to conduct such analysis precludes any conclusion that the proposed siting is the least damaging option available.

The deficiencies also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or 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 indicate that mitigation by design has not been employed, relying instead on post-design mitigation measures.

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

From a policy perspective, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The failure to present a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding its impact on marine ecology and protected species, particularly within the West Lewis coastal environment. This area is known for its biological activity and sensitivity, yet the assessment provided is materially deficient, lacking a complete and reliable understanding of ecological receptors. The methodologies used in the assessment do not effectively capture the presence, behaviour, and habitat use of vital species. Consequently, the evidential basis for evaluating potential impacts is inadequate.

A significant oversight is the failure to properly assess the presence of otters, which are a European Protected Species. The application does not adequately acknowledge their active use of coastal areas for foraging and movement. This neglect extends to their

core foraging range and behavioural patterns, leaving potential effects from construction disturbances, noise, and increased activity unassessed. This gap undermines the conclusions drawn about the absence of significant effects on otters.

Further complications arise in the assessment of basking sharks, where reliance on aerial surveys introduces a notable detection bias, particularly in challenging Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when juxtaposed with established land-based observations that indicate frequent use of the waters. The failure to properly consider such crucial data contributes to an incomplete baseline, further weakening the reliability of the assessment's conclusions.

These methodological shortcomings mean that assertions of negligible or non-significant effects rest on assumptions rather than robust evidence. The lack of adequate baseline data inhibits a thorough evaluation of cumulative and indirect impacts, which includes seasonal variations and wider ecosystem interactions. This creates considerable uncertainty regarding the true risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not adequately identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Given these circumstances, granting consent cannot be justified.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These issues hinder a robust evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

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

fully understood.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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 lack of transparency in the assessment of social impacts, health, and wellbeing is a serious concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents, but the full report has not been released. This creates a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks identified through the developer's research.

Available summaries show that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and are not mere speculation. However, without access to the complete assessment, it is impossible to scrutinise the findings thoroughly, which limits the ability to evaluate their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, as "cultural loss" has been highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately integrated into the main application or given the necessary consideration. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this size, especially when community character and functioning are at stake. By withholding the complete dataset, the application does not provide a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with

National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence available indicates existing negative effects that have not been fully reported. Without the full assessment, compliance with this policy remains unproven.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and landscape changes is significantly inadequate, failing to capture the sensitivity of the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally transforming this landscape and causing permanent alteration.

The evaluation does not sufficiently convey the extent of the visual change that would arise. Given the scale and proximity of the turbines, they are poised to dominate views from residential areas, historic locations, and popular coastal sites. This would negatively affect visual amenity and diminish the natural and remote qualities that define the area. The assessment neglects to accurately reflect this level of impact and its significance within the context of such a vulnerable landscape.

Concerns also exist 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, particularly with respect to important cultural heritage sites and valued landscapes. This raises the possibility that the visual impact may have been understated, thus questioning the reliability of the overall assessment.

Additionally, the relationship between landscape, seascape, and cultural heritage has not been thoroughly evaluated. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a wider landscape context linked by visual and spatial relationships to the Atlantic horizon. By treating these heritage assets as isolated entities, the assessment fails to appreciate their interdependence, leading to an incomplete understanding of how impacts affect their settings 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 broader cultural and spatial harm that has not been sufficiently examined in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, especially concerning the protection of natural environments and historical assets. The magnitude of change is inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally important sites. The lack of a thorough worst-case assessment further weakens any assertion of policy adherence.

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 change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the impact scale, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings undermine the ability to provide a reliable evaluation and underscore the conclusion that the proposal is incompatible with the need to protect this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on unspecified future measures raises substantial concerns, particularly given the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on strategies for prevention, control, or monitoring of these issues.

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

Furthermore, the absence of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent

phase, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures effectively at the point of determination.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not adequately address the ecological and socio-economic impacts on these vital resources. It lacks a robust evaluation and fails to demonstrate how the fishing activity and habitats can be preserved without significant disruption.

A critical concern is the assumption that fishing can be displaced without negative consequences. The application offers no evidence that alternative fishing grounds are available or capable of absorbing the additional pressure from displaced activities. This is a serious oversight, as displacement could lead to overfishing in other areas and adversely affect the local fishing fleet's economic stability. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling expected over an extended period is likely to disturb marine life across considerable distances, potentially impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without providing sufficient evidence.

There is a notable inconsistency within the application regarding the need for licences for harm to European Protected Species while simultaneously asserting that the impacts are negligible. This contradiction raises significant questions about the credibility of the assessment and compliance with the Habitats Regulations, especially where harm necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without an exhaustive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be fully understood.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally lacking and fails to encompass the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately. This disjointed approach obscures the true magnitude of the environmental and socio-economic consequences.

The onshore components involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access infrastructure through sensitive landscapes. These operations necessitate excavation in areas of deep peat, especially within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not deliver a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

Moreover, by deferring or omitting the assessment of onshore impacts, the application obstructs an appropriate evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be reviewed collectively; however, the distinct assessment of offshore and onshore components fails to capture the combined effects on peatlands, habitats, and communities.

There are also grave risks posed to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not adequately illustrate that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, leaving a significant evidential gap concerning biodiversity protection.

The proposal additionally raises issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the goals of renewable energy initiatives. This application does not sufficiently address this

concern or prove that the overall carbon balance remains favourable.

Furthermore, the routing of infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the requisite consents or procedures have been initiated, leading to uncertainty regarding deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are a vital aspect of the area's environmental quality, cultural identity, and tourism appeal. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment. This significant alteration is not addressed in the application, which fails to evaluate the impact of such lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the increasing importance of dark skies to the area's identity and to burgeoning sectors like astro-tourism, this omission creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no consideration of the effects on nocturnal wildlife, which is critical. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, a phenomenon that can lead to disorientation and heightened collision risks. The absence of a lighting impact assessment or a phototaxis study means the application neglects to evaluate how aviation lighting may affect these species or contribute to their mortality rates. Additionally, the ornithological assessment relies solely on daytime survey data, overlooking nocturnal activity and associated dangers. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been examined. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of these nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination. Furthermore, the failure to address these issues conflicts with National

Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time is an integral part of the environment.

In summary, 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 incomplete and incapable of supporting a lawful determination.

TOURISM

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

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and contributes up to 16% of the island's economy. However, the application neglects to model the potential impacts of industrialisation on the seascape and the consequent loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the island. This lack of analysis obscures whether the proposed development would yield a net economic benefit or adversely affect this established and growing sector.

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

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the standards of sustainable development as required by statutory duties and national policy. It mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to address these critical areas adequately.

A major concern is the lack of a complete and reliable evidential basis for the application. There are significant gaps in baseline data, an undefined design envelope is still in use, and there is a heavy reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural failures are evident in the application as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial 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 consideration.

Furthermore, the proposal contradicts the National Planning Framework 4, lacking evidence for the protection of biodiversity, natural areas, and cultural heritage. It does not demonstrate that the impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact assessments. The cumulative impacts of both offshore and onshore components have not been appropriately evaluated, leading to a lack of clarity regarding the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion regarding the acceptability of the impacts.

The proposal would induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies,

the disruption of cultural and visual relationships, and the negative effects on tourism signify permanent impacts that cannot be sufficiently mitigated.

In summary, the application presents both procedural and substantive deficiencies that render it unfit for determination. The extent of the informational gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

It will totally destroy the island as we know it. Everything will have to change to accommodate it. The visual, health, marine and cultural impacts will be greatly felt. The island will be overwhelmed with too many people during the construction with not enough facilities to deal with them such as doctors and other health care providers. It will end up with all turbines and no population because people won't be able to live here any more.

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: FBB04902

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The concerns raised stem from a thorough examination of the Environmental Impact Assessment Report and associated documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, a region known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The size, location, and design of the project raise critical questions about its alignment with statutory obligations, national policy, and the principles of sustainable development.

The application is lacking in sufficient evidential support for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and key components of the proposal are not clearly defined. The flexible design framework used inhibits a proper understanding of potential significant effects, and the reliance on unspecified mitigation measures prevents any assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts are not backed by solid evidence.

There are evident and serious conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the ability of the competent authority to conclude that the development is acceptable according to policy.

The unprecedented scale of the project raises significant issues, with large turbines proposed in close proximity to the shoreline, which could have substantial implications for 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. Under these conditions, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and render it fundamentally unreliable. The absence of specific turbine dimensions, layouts, or configurations due to the use of a flexible Project Design Envelope introduces a significant level of uncertainty. This lack of commitment prevents the application of a worst-case scenario consistently, which compromises the integrity of the assessment. Consequently, the impacts described may not accurately represent the final development, hindering both public comprehension and the ability of the competent authority to gauge the true environmental effects.

Moreover, the application hinges on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the promise of addressing environmental harm at a later date impedes any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment process, which mandates that significant effects and necessary mitigations be clearly identified before any determination is made.

Additionally, the report suffers from evidential shortcomings, which include gaps in baseline data and methodological limitations. The reliance on assumptions instead of site-specific evidence creates uncertainty surrounding the scale and significance of impacts. This is particularly concerning where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot align with statutory requirements.

Due to these shortcomings, the application does not meet the evidential threshold established under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This raises concerns about the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to comply with the requirements outlined in National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data collectively undermine the reliability and completeness of the Environmental Impact Assessment Report. These critical deficiencies mean that a lawful and thorough assessment of environmental effects cannot be conducted, leaving the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns due to a deficient assessment of marine ecology and protected species, particularly within the sensitive and

biologically rich West Lewis coastal environment. The methodologies employed fail to present a comprehensive understanding of ecological receptors, resulting in incomplete baseline data that inadequately captures species presence, behaviour, and habitat use. This deficiency undermines the evidential basis required for evaluating potential impacts.

Among the critical shortcomings is the assessment of otters, a European Protected Species. The application does not fully recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behaviour means that the potential impacts of construction disturbances, noise, and increased activity have not been properly evaluated, thus compromising any conclusions drawn about the absence of significant effects on this species.

Additionally, the evaluation of basking sharks reveals further weaknesses, as reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of these animals, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to adequately incorporate or consider such data results in an incomplete understanding of the baseline, diminishing the reliability of the conclusions reached.

These methodological inadequacies lead to the conclusion that claims of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. Consequently, uncertainty prevails regarding the actual risks posed to marine species and habitats.

From a regulatory viewpoint, the application falls short of meeting the standards set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This introduced uncertainty hinders the ability to exclude adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. Under these circumstances, granting consent would not be legally justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, riddled with internal inconsistencies and significant gaps in evidence. It does not adequately demonstrate that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not face adverse effects from the proposed development. This area is crucial for foraging and migratory pathways, yet the

potential risks of displacement, collision, and habitat loss have not been sufficiently evaluated.

There is a notable contradiction in the application; while the developer asserts that there will be no significant adverse effects, they simultaneously present a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This raises serious doubts about the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided.

The assessment lacks adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding areas is not thoroughly considered, and the reliance on modelling approaches adds further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate potential mortality, especially in the face of incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognized migratory corridor poses a significant risk, effectively creating a barrier for species travelling between the United Kingdom and Iceland. There is insufficient assessment of the long-term implications of sustained mortality within this corridor or the potential impacts on species with limited global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to confidently conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and undermines any lawful conclusion in favour of consent.

Moreover, these deficiencies reflect a failure to adhere to 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 directly in conflict with national policy.

Collectively, the assessment is deemed unreliable due to its internal contradictions, methodological flaws, and lack of sufficient evidence. These issues impede a thorough evaluation of impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with this application is significantly lacking in transparency and is therefore not compliant with legal requirements. Although the developer has commissioned a Social Impact Assessment that involved focus groups with local residents, the complete report has not been made available to the public. This absence creates a considerable evidential gap, limiting both public understanding and the capacity of the competent authority to fully assess the social risks highlighted in the developer's own research.

Summaries that are available reveal that local residents are already experiencing

notable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These findings stem from direct community engagement and should be taken seriously rather than dismissed as speculation. However, the lack of access to the comprehensive assessment hampers proper scrutiny of these findings and obstructs a thorough evaluation of their importance in the decision-making process.

Moreover, there is documented evidence suggesting that the proposal is viewed as a direct threat to the community's identity and cohesion, with "cultural loss" explicitly mentioned in the developer's own findings. These adverse impacts have not been adequately considered in the main application, nor have they been given the necessary weight in the assessment. The withholding of the full Social Impact Assessment obscures the actual social and human costs of the proposed development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. An in-depth understanding of the social, economic, and health repercussions is essential for developments of this magnitude, especially when community character and functionality are at stake. The failure to provide complete data means that the application does not offer a full evidential basis to evaluate the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are required to foster positive health outcomes and mitigate any harm; however, the evidence available suggests the presence of adverse effects that have not been fully disclosed. Without the complete assessment, there can be no demonstration of compliance with this policy.

The implications of these procedural shortcomings are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission constitutes a material failure within the application and does not meet the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, coupled with existing evidence of adverse effects, leads to an incomplete and unreliable evaluation. This situation precludes a lawful determination and further reinforces the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts in the application is significantly lacking and does not fully capture the extent of the changes or the sensitivity of the environment it would affect. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The proposal to introduce large-scale turbines near the shoreline would create an overwhelming industrial presence, leading to a permanent and irreversible

alteration of this landscape.

The assessment fails to adequately depict the scale of the visual change expected from the turbines, which would dominate views from residential areas, historic locations, and popular coastal spots. This would severely impact visual amenity, detracting from the area's naturalness and sense of remoteness. Such shortcomings in the evaluation overlook the significant implications of these impacts on a landscape known for its sensitivity.

Concerns also arise regarding the methodologies used to choose and present visual viewpoints. There is evidence that these viewpoints may not encompass the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This raises the possibility that the actual visual impact has been underestimated, thereby questioning the reliability of the overall assessment.

Another notable deficiency is the lack of consideration for the interconnected nature of landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape context, defined by visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated entities, the assessment fails to recognise their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural value.

The introduction of industrial elements to the seascape would disrupt these relationships, changing the environment in which heritage sites are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but a deeper cultural and spatial disturbance that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, especially concerning the safeguarding of natural landscapes and historic assets. The level of change proposed is incompatible with the imperative to protect landscape character, visual amenity, and the contexts of culturally significant sites. The failure to provide a comprehensive worst-case assessment further undermines any assertions of compliance with relevant policies.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes envisaged would be fundamental and permanent, rendering the possibility of acceptable mitigation illusory.

In summary, the assessment does not accurately reflect the magnitude of the impacts, the environment's sensitivity, or the intrinsic connections between landscape and heritage. These deficiencies hinder a reliable evaluation and strengthen the conclusion

that the proposed development is fundamentally incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of environmental risks related to construction and pollution is inadequate, lacking the necessary details to properly evaluate potential impacts. The proposed works involve significant seabed preparation and installation in a high-energy Atlantic setting, yet the application fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on future mitigation and contingency measures that will be established after consent, which hinders any meaningful assessment of their potential effectiveness or adequacy.

This dependence on undefined future measures is particularly alarming given the delicate nature of the environment in question. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and possible chemical or oil spills, it falls short in detailing the methods for preventing, controlling, or monitoring these threats.

Furthermore, there is considerable uncertainty regarding the magnitude and behaviour of sediment plumes that may result from seabed disturbance and cable installation. The absence of rigorous modelling and clearly delineated management strategies makes it impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the potential effects on sensitive marine species and habitats that have already been identified in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces a significant procedural risk and diminishes the capacity of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Assessment of likely significant effects and mitigation measures must occur prior to consent, and the absence of this information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy mandates concerning environmental protection and water quality.

In conclusion, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts culminates in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the argument 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 onshore elements of this project include cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and an ecologically sensitive habitat. The application fails to provide a comprehensive assessment of the impacts, which limits understanding of the project's overall environmental footprint.

The assessment of onshore infrastructure is materially incomplete. The offshore turbines and onshore works are intrinsically linked but are being assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects. By excluding or deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. All components of a project should be considered together, yet the separation means that combined impacts on peatlands, habitats, and communities are not fully understood.

Significant risks to sensitive habitats, including machair systems and peatland environments, exist, and these habitats are subject to policy protection. The application does not demonstrate that the impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented. This represents a clear evidential gap regarding biodiversity protection.

There are also concerns about carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this issue or prove that the overall carbon balance remains beneficial.

Moreover, routing infrastructure through active croft land could lead to conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, which raises doubts about deliverability and lawful implementation.

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 goes against the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines 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 make this part of the application incomplete and unreliable, which prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed application neglects the assessment of dark skies and nocturnal wildlife, which is a significant omission from the Environmental Impact Assessment. The West

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

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

In addition, there is a critical absence of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase collision risks. The application does not provide a lighting impact assessment or a phototaxis study, resulting in an inadequate assessment of how aviation lighting might affect these species or potentially raise mortality rates.

This omission is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

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

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

TOURISM

The evaluation of tourism impacts within the application is fundamentally flawed, lacking a comprehensive analysis of the economic and social ramifications for a vital

segment of the Isle of Lewis's economy. Tourism thrives on the region's wild coastline, its largely untouched landscapes, dark skies, and an overarching sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, the application fails to provide any quantifiable assessment regarding how large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions of tourism.

The growth of tourism has been remarkable, escalating from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the proposal does not simulate how the potential industrialisation of the seascape and the degradation of environmental quality might affect Tourism Gross Value Added or the broader economic resilience. The lack of such crucial analysis renders it impossible to ascertain whether the development would produce a net economic benefit or threaten an established and expanding sector.

Furthermore, the assessment neglects to acknowledge the significance of environmental quality in fostering tourism, particularly the role of unspoiled landscapes and dark skies in shaping visitor experiences and in burgeoning markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a vital and expanding aspect of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It contradicts strategic objectives that designate tourism as a priority growth sector and falls short of supplying sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, these deficiencies in quantifying tourism impacts, evaluating the environmental factors influencing visitor behaviour, and recognising the island's economic dependence culminate in a substantial evidential gap. This gap obstructs a thorough assessment of the economic effects and supports the conclusion that the application is inadequate.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This proposal mirrors the fundamental issues that led to the refusal of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was highlighted.

Although the current submission is made under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

A reliable evidential basis for determination is notably absent in the application. Critical gaps in baseline data, the reliance on an undefined design envelope, and unspecified mitigation measures contribute to this inadequacy. Furthermore, the omission of key impact pathways, such as those affecting nocturnal wildlife, the full onshore infrastructure, and tourism impacts, render the Environmental Impact Assessment incomplete. This deficiency hinders a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the failure to disclose the full Social Impact Assessment constitutes a significant omission. These failures impede the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, thereby making the application unsuitable for determination.

The proposal directly conflicts with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage. Additionally, there is a lack of evidence to support acceptable health and wellbeing impacts, as well as a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, which obscures the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential threshold required to demonstrate that adverse effects are excluded beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and precluding a lawful conclusion regarding the acceptability of the impacts.

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

Collectively, these issues render the application both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy conflicts, and unresolved environmental risks prevents an evidence-based decision. The competent authority must either refuse consent based on these grounds or exercise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I don't live in the area, but I believe windfarms should be in the central belt, closer to the areas that use more electricity. Such a scenic rural location will be spoiled for, in my opinion, not a good enough reason. The subsequent additional infrastructure to store, transform and transport the power is so out of place, it is unimaginable that our planners and government would allow this to go ahead. Why ruin the wild unspoilt areas? This is the wrong place for such a project.

My objection has used a format which other people have taken a lot of time to formulate, which I very much appreciate. It's beyond me to read and understand all the documents that go hand in hand with such applications.

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: 28DA0384

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

Dear Sir/Madam

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The marine ecology and protected species assessment lacks the necessary completeness and reliability to fully understand the ecological receptors present in the West Lewis coastal environment. This region is both sensitive and biologically active; however, the baseline data is inadequate, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment fails to establish a robust evidential foundation for evaluating potential impacts.

Among the critical shortcomings is the insufficient recognition and assessment of otters, a European Protected Species, which actively utilise coastal areas for foraging and movement. The assessment neglects to account for their core foraging range and behavioural patterns, leading to an inadequate evaluation of how construction disturbance, noise, and increased activity might affect them. This significant omission undermines any conclusions regarding the lack of considerable effects on the species.

Additionally, there are notable deficiencies in the assessment of basking sharks, with the reliance on aerial surveys creating a substantial detection bias, particularly under Atlantic conditions. This methodological choice is likely to lead to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to incorporate or appropriately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological limitations highlighted result in a reliance on assumptions rather than sound evidence, particularly regarding conclusions of negligible or non-significant effects. Furthermore, the absence of comprehensive baseline data hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant flaws, revealing substantial gaps in evidence and inconsistencies that challenge its findings. The Isle of Lewis's west coast

is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately prove that these species will not be negatively impacted. It is situated in crucial foraging areas and migratory routes, yet the assessment inadequately considers the risks of displacement, collision, or habitat loss.

There is a notable contradiction in the application: the developer claims there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack support from the underlying evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding areas is not thoroughly addressed, and the reliance on modelling introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

The proposed location of turbines within a recognised migratory corridor raises further concerns, as it could create a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term effects of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements necessary to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory claims, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hampers a lawful conclusion supporting consent. Moreover, the identified deficiencies indicate a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

Overall, the assessment is deemed unreliable due to internal contradictions, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of the potential impacts and contribute to the conclusion that the application does not fulfill the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is acknowledged as a living cultural landscape, where the interplay of environment, language, tradition, and community is essential. However, the application fails to recognise this interconnectedness, instead treating cultural heritage as a collection of static assets devoid of their dynamic social, cultural, and spiritual roles within the community. This reductive approach leads to a significant oversight

regarding culturally significant sites, particularly the active burial and spiritual sites at Dalmore, Bragar, and Barvas. The assessment inaccurately categorises these places as static features, neglecting their continued use and the implications of development on their surroundings, which skews the evaluation of cultural effects and disregards their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment, is not addressed in the assessment. These vital elements contribute significantly to the area's identity, yet their absence represents a considerable oversight. The failure to incorporate these aspects limits the understanding of the true cultural impact of the proposed development.

Community rights and engagement are also central to this issue. The Gaelic-speaking population, characterised as an Indigenous People, has not been consulted in a manner that reflects the principles of Free, Prior and Informed Consent. This lack of meaningful engagement not only undermines the validity of the assessment but also fails to adhere to established practices in matters affecting cultural and environmental interests.

A critical procedural shortcoming is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from meeting its legal obligations to evaluate the social, cultural, and economic impacts on the island community, thus impeding lawful determination of the proposal.

From a policy standpoint, these deficiencies contradict the National Planning Framework 4, especially regarding the protection of historic assets and spaces. The disregard for both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, signifies a clear deviation from required policy standards.

In summary, the lack of assessment of living heritage, intangible cultural values, community rights, and adherence to statutory requirements creates a substantial evidential gap. The cultural impacts of the proposed development remain inadequately addressed, and the application fails to establish a sufficient basis for understanding the genuine cultural cost associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. This area is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. Introducing such industrial structures in close proximity to the shoreline would establish a persistent industrial presence, fundamentally altering the unique character of the environment and leading to a permanent transformation of the landscape.

The application fails to adequately capture the magnitude of the visual changes anticipated. The size and proximity of the turbines would overshadow views from nearby residential areas, historic sites, and popular coastal locations, negatively impacting visual amenity and diminishing the area's defining characteristics of naturalness and remoteness. The existing assessment does not effectively communicate the significance of these impacts within the context of this sensitive landscape.

Concerns also arise regarding the methodology used for selecting and presenting visual viewpoints. There is evidence to suggest that the viewpoints chosen do not fully represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This suggests a potential understatement of the visual impact, which compromises the reliability of the assessment.

Moreover, the assessment does not adequately evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The current assessment treats these heritage assets in isolation, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of transformation proposed conflicts with the necessity to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with relevant policies.

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

Collectively, the assessment fails to represent accurately the scale of the impacts, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and reinforce the conclusion that the proposal is fundamentally incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application does not provide adequate detail to evaluate the likely environmental effects of the proposed construction and pollution risks. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be prepared after consent has been granted, which hampers any meaningful assessment of their effectiveness or adequacy.

This reliance on undefined future measures raises concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential accidental chemical or oil spills, it does not supply sufficient information on prevention, control, or monitoring strategies.

There remains uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and clearly outlined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the potential effects on marine species and habitats that are already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a stage following consent, the application limits the evaluation of whether suitable safeguards exist to address pollution events. This deferral introduces procedural risk and diminishes the capability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated before consent can be granted, and when such information is lacking, a lawful determination cannot occur. The application also falls short in demonstrating compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts lead to a materially inadequate assessment. These flaws inhibit 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. However, the current application presents an inadequate assessment of fisheries and marine life, failing to robustly evaluate ecological or socio-economic impacts. There is a significant concern regarding the assumption that fishing

activities can be displaced without adverse effects. The application lacks evidence that alternative fishing grounds are available or can absorb additional pressure, raising the risk of overfishing in other areas, which could have far-reaching economic consequences for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

The proposal also poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. High-energy hammer piling over an extended duration is likely to disturb marine life across vast distances, notably affecting species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population is alarming, yet the application diminishes the significance of these effects without adequate supporting evidence.

Moreover, there is an evident inconsistency in the application, as it acknowledges the need for licenses to permit harm to European Protected Species while concurrently describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious compliance concerns with the Habitats Regulations, especially when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks cumulative impacts resulting from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without an exhaustive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic environment.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

Significant onshore elements, including cabling across protected moorland, the

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks an assessment of dark skies and nocturnal wildlife, which represents a significant omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism potential. Introducing permanent red aviation lighting will create a persistent and intrusive “wall of light” effect on the western horizon, fundamentally changing the night-time environment.

This application does not evaluate the impact of the lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important because dark skies are crucial to the area's identity and emerging tourism sectors like astro-tourism. The failure to consider these effects signifies a clear shortcoming in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts 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 collision risks. The application fails to include any lighting impact assessment or phototaxis study, meaning it does not address how aviation lighting might affect these species or contribute to increased mortality.

The reliance on daytime survey data in the ornithological assessment exacerbates this issue, as it does not account for nocturnal activity or associated risks. Kittiwakes, for instance, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4's directives on protecting natural places and environmental quality. Additionally, it undermines the broader evaluation of landscape and seascape impacts, as the character of the night environment is an integral aspect of the overall setting.

Ultimately, 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 unable to support a lawful determination.

TOURISM

The application inadequately assesses the impacts on tourism, which is vital to the economy of the Isle of Lewis. This sector 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 quantify how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has witnessed substantial growth, increasing from £65 million in 2017 to over £81.5 million and supporting more than 1,000 jobs, representing up to 16% of the island's economy. Nevertheless, the application does not analyse how the industrialisation of the seascape and degradation of environmental quality could affect

Tourism Gross Value Added or the broader economic resilience. Without such an analysis, it remains unclear whether the development would yield a net economic benefit or threaten an established and expanding sector.

Furthermore, the role of environmental quality in bolstering tourism is not addressed. The significance of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets, such as nature-based tourism and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on this recognised and growing segment of the local economy.

The implications of failing to assess tourism impacts extend beyond the sector itself, affecting employment, local businesses, and the sustainability of the community within this island context that has limited economic diversification. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated as required under the Islands (Scotland) Act 2018.

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

In summary, the shortcomings in quantifying tourism impacts, the neglect to assess the environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This deficiency hampers 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 criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application revisits issues that led to the rejection of the Lewis Wind Power proposal in 2008, where unacceptable levels of industrialisation were identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a comprehensive or dependable evidential basis for evaluation.

Significant gaps exist in the baseline data, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures, as well as the omission of essential impact pathways including nocturnal wildlife, full onshore infrastructure, and tourism effects, renders the Environmental Impact Assessment incomplete. This lack of thoroughness inhibits a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as per the Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Additionally, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to show acceptable health and wellbeing impacts, and cannot substantiate a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty around environmental risks remains considerable. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, which invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed development would lead to significant 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, along with negative impacts on tourism, would result in permanent effects that cannot be adequately mitigated.

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 372914B0

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. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, which highlight significant deficiencies across planning, environmental, cultural, and procedural dimensions. The wind farm is planned off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The design, proximity, and overall scale of the proposal raise critical questions about its compliance with statutory obligations, national policy frameworks, and the core principles of sustainable development.

A fundamental issue with the application is the inadequate evidential basis for reaching a lawful determination. Important environmental data is absent, baseline information appears limited and inconsistent, and several key elements of the proposal remain vague. The flexible design framework employed complicates an accurate assessment of potential significant effects. Furthermore, the documentation relies on unspecified mitigation measures, which hinders the ability to evaluate their effectiveness. Consequently, it does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, leaving the claims of negligible or non-significant effects unsupported by solid evidence.

The proposal encounters notable policy conflicts. It does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and overall health and wellbeing. The application fails to prove that it meets national criteria aimed at protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies impact the statutory tests needed for consent and challenge the competent authority's ability to determine the proposal's acceptability in terms of policy.

Moreover, the unprecedented scale of the development in this area raises substantial concerns about its landscape capacity, visual impact, and environmental repercussions, especially with large turbines situated close to the shoreline. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential deficiencies, and clear policy non-compliance indicate that the application is insufficient and unable to support a lawful determination. In light of these factors, adherence to the precautionary principle is essential.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The proposed development raises significant concerns regarding the adequacy of the alternatives assessment, which fails to meet the requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of feasible alternatives based on environmental consequences, the application merely recounts the evolution of the project. This method does not adequately demonstrate

that less damaging options have been properly evaluated and chosen over more harmful solutions.

Moreover, there is a lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely contemplated positioning turbines further offshore, where visual, ecological, and coastal impacts would probably be diminished. Considering the delicate nature of the West Lewis coastline and the critical role of proximity to shore in assessing impacts, the failure to perform such an analysis prevents any conclusion that the proposed location is the least damaging option.

These shortcomings are also evident in the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been explored thoroughly to reduce impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and the lack of comparative analysis suggest that mitigation through design has not been properly considered, relying instead on measures to mitigate impacts after the design has been established.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species presented in the application is materially deficient. It fails to provide a complete or reliable understanding of the ecological receptors within this area. The methodologies employed do not adequately capture species presence, behaviour, and habitat use, leading to an incomplete baseline data set. Consequently, the assessment lacks a sound evidential basis for evaluating the impacts of the proposed development.

One significant oversight is the assessment of otters, a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. It neglects to consider their core foraging range and

behavioural patterns, which means the potential effects of construction disturbance, noise, and increased activity on otters have not been adequately assessed. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks is similarly flawed, as it relies heavily on aerial surveys that introduce a significant detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when contrasted with established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and further weakens the reliability of the conclusions drawn in the application.

These methodological shortcomings imply that the conclusions regarding negligible or non-significant effects are based more on assumptions than on robust evidence. The absence of sufficient baseline data also hinders a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and wider ecosystem interactions. This leads to uncertainty regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4. The failure to properly identify or assess protected species creates a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. In light of these factors, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, exhibiting serious gaps in evidence and notable internal inconsistencies. The west coast of the Isle of Lewis is home to internationally significant seabird populations that are already declining. However, the application fails to provide the necessary evidential standard to prove that these species will not be adversely affected by the proposed development. Situated within crucial foraging areas and migratory routes, the assessment inadequately evaluates the potential consequences of displacement, collision risk, and habitat loss.

A key contradiction arises within the application, as the developer asserts there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and suggests that its

conclusions are not substantiated by the evidence presented.

Moreover, the assessment lacks sufficient evidence regarding the impacts on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. It inadequately acknowledges the significance of these feeding grounds, and its reliance on modelling methods generates uncertainty, particularly for species facing severe decline, including Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The proposed turbine siting within a recognised migratory corridor adds another significant risk, effectively erecting a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently explore the long-term ramifications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to affirm that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and limitations in modelling, means the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, precluding a lawful conclusion in favour of consent.

Furthermore, these identified deficiencies signify a failure to adhere to National Planning Framework 4 regarding the protection of biodiversity and natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CONSTRUCTION AND POLLUTION RISKS

The application does not provide adequate detail to evaluate the likely environmental effects of the proposed construction and pollution risks. It involves significant seabed preparation and installation works in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be prepared after consent has been granted, which hampers any meaningful assessment of their effectiveness or adequacy.

This reliance on undefined future measures raises concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and

contamination. Although the application acknowledges risks such as sediment mobilisation and potential accidental chemical or oil spills, it does not supply sufficient information on prevention, control, or monitoring strategies.

There remains uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and clearly outlined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the potential effects on marine species and habitats that are already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a stage following consent, the application limits the evaluation of whether suitable safeguards exist to address pollution events. This deferral introduces procedural risk and diminishes the capability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated before consent can be granted, and when such information is lacking, a lawful determination cannot occur. The application also falls short in demonstrating compliance with policy requirements concerning environmental protection and water quality.

Overall, the deficiencies in defined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts lead to a materially inadequate assessment. These flaws inhibit a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a fragmented assessment of the onshore infrastructure, which is significantly incomplete and fails to consider the comprehensive impacts of what constitutes a single integrated project. The offshore turbines and the associated onshore works are deeply interconnected yet evaluated in isolation. This disjointed approach obscures the genuine scale of both environmental and socio-economic consequences.

Among the onshore components are plans for cabling that traverses protected moorland, the construction of a substation near Stornoway, and the establishment of access routes through vulnerable landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, a region recognised for its ecological sensitivity and substantial carbon storage. The current application does not deliver a thorough assessment of these impacts, thereby hindering an accurate understanding of the project's overall environmental footprint.

By neglecting to assess the onshore impacts adequately, the application compromises the evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively; however, the split between offshore and onshore evaluations leads to a lack of clarity regarding the combined impacts on habitats, peatlands, and local communities.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that impacts on these critical habitats have been thoroughly assessed or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the project's carbon balance. The disruption of peatland has the potential to release stored carbon, resulting in a carbon debt that undermines the aims of renewable energy development. The application inadequately addresses this issue and does not establish that the overall carbon balance is advantageous.

Moreover, the infrastructure routing through active croft land introduces possible conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been initiated, leading to doubts about the project's viability and lawful execution.

From a policy standpoint, the disjointed evaluation of the project and the failure to safeguard peatlands, habitats, and land use interests stand in conflict with the National Marine Plan and National Planning Framework 4. The incapacity to demonstrate that potential impacts can be avoided or mitigated further weakens the application.

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

TOURISM

The application inadequately assesses tourism impacts and neglects to evaluate the economic and social consequences for a crucial sector of the Isle of Lewis economy. The area's tourism is fundamentally reliant on its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. It is acknowledged that 86% of visitors are attracted by the scenery, yet there is no quantified analysis regarding how large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the Isle has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Despite this progress, the application fails to consider how the industrialisation of the seascape and a decline in environmental quality could affect Tourism Gross Value Added or broader economic resilience. Without such an

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

Moreover, the assessment overlooks the significance of environmental quality for tourism, particularly the value of unspoiled landscapes and dark skies in enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a major gap in understanding the impacts on this acknowledged and growing component of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate impacts on tourism has broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been duly examined as mandated by the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, failure to assess environmental influences on visitor behaviour, and disregard for the island's economic dependence culminate in a significant evidential gap. This deficiency hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards necessary for sustainable development when evaluated against relevant statutory duties and national policies. This situation mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Presently, the application is submitted under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a reliable and complete evidential basis for decision-making. It is marked by significant gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and critical omissions regarding impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a comprehensive understanding of the likely significant effects and residual impacts.

Procedural failures are also evident. The absence of a compliant Island Communities Impact Assessment represents a violation of statutory duties under the Islands (Scotland) Act 2018, while the non-disclosure of the complete Social Impact

Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not effectively demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to provide evidence that health and wellbeing impacts are acceptable, or that there is a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are both incomplete and, at times, inconsistent. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

Moreover, the proposal is poised to induce considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and adverse impacts on tourism are all permanent consequences that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, the competent authority must refuse consent on these grounds or invoke the necessary regulatory provisions to obtain the missing information.

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

Additional Comments

I object to the fact that the electricity generated is transmitted off the Island down south and Islanders don't benefit from cheap electricity.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: AAD8601C

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 within the frameworks of marine licensing and Environmental Impact Assessment. The objection arises from an examination of the Environmental Impact Assessment Report alongside supporting documents, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Located off the west side of the Isle of Lewis, an area characterised by its Atlantic coastline, relatively unspoilt environment, and rich cultural heritage, the proposed development's scale, design, and proximity raise serious questions about its alignment with statutory obligations, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined aspects of the proposal. The flexible design framework used does not allow for a clear comprehension of the potential significant effects, while the unspecified mitigation measures hinder the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the impacts on the environment, culture, and community, with claims of negligible effects lacking robust support.

Moreover, there are evident and significant conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not sufficiently demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests required for consent and compromise the competent authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of this proposal, featuring large turbines situated near the shoreline, raises major concerns about the capacity of the landscape, visual impact, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential gaps, and clear policy inconsistencies illustrate that the application is incomplete and does not support a lawful determination. In light of these factors, it is essential that the precautionary principle is invoked.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess the cultural heritage and community identity of the West Lewis coastline, which is a vibrant cultural landscape where the environment, language, tradition, and community are intertwined. Instead of recognising this complexity, the application adopts a simplistic view, treating heritage as mere isolated features rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming is evident in the handling of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment reduces them to static entities, neglecting their continued use, meaning, and the consequences of development on their surroundings. This mischaracterisation leads to a partial understanding of the cultural implications and overlooks their integral role in community life.

Moreover, the application neglects to evaluate intangible cultural heritage, such as the Gaelic language and traditions, alongside the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but are entirely omitted from the assessment, representing a significant gap in understanding. Without these considerations, the true cultural impact of the development remains elusive.

Concerns surrounding community rights and engagement also arise, as the Gaelic-speaking population possesses a distinct cultural identity akin to that of an Indigenous People. Despite this, there has been no process of Free, Prior and Informed Consent conducted. The lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles for participation in matters affecting cultural and environmental interests.

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

From a policy standpoint, these deficiencies position the proposal in direct conflict with National Planning Framework 4, particularly regarding the preservation of historic assets and places. The failure to consider both tangible and intangible heritage, along with the disregard for living cultural practices, represents a clear violation of policy standards.

In summary, the lack of assessment regarding living heritage, intangible cultural values, community rights, and adherence to statutory obligations culminates in a significant evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application does not present an adequate basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal has raised considerable concerns regarding community identity and cohesion, with findings from the developer indicating a potential “cultural loss.” Despite this acknowledgement, these impacts have not been adequately incorporated into the main application or sufficiently weighted in the assessment process. This omission highlights a significant evidential gap, as the full Social Impact Assessment has not been published. Consequently, both the public and the competent authority are unable to grasp the full extent of the social risks identified by the developer’s own research.

Residents are already reporting measurable levels of stress, anxiety, and concern resulting from the scale and proximity of the proposed development. These impacts stem from direct engagement and should not be regarded as speculative. However, the lack of disclosure surrounding the full assessment limits the capacity for thorough scrutiny of the findings and hinders the determination of their relevance within the decision-making framework.

Furthermore, this lack of transparency compromises the Environmental Impact Assessment process, as a complete understanding of social, economic, and health impacts is crucial for developments of such magnitude. The application fails to present a comprehensive evidential basis for weighing the balance between benefits and harm due to the absence of the complete dataset.

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 mitigate harm, yet the available evidence suggests existing adverse effects have not been fully disclosed. Without access to the full Social Impact Assessment, it cannot be substantiated that the application aligns with this policy.

The procedural implications are considerable, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application, failing to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This deficiency obstructs a lawful determination and underscores the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon and an undeveloped character that embodies a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally altering the landscape and causing a permanent transformation. The assessment of seascape, landscape, and visual impacts is deficient, failing to adequately reflect the scale of change or the sensitivity of the receiving environment.

The application does not accurately represent the extent of the visual change. Given the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. The significance of this impact has not been properly conveyed, particularly considering the sensitivity of the landscape.

Moreover, there are methodological concerns regarding the chosen visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the magnitude of visual impact is understated, which undermines the reliability of the assessment.

A further shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape setting connected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated rather than recognising their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

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

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

FISHERIES AND MARINE LIFE

The inadequacy of the assessment regarding fisheries and marine life raises serious concerns about the potential ecological and socio-economic impacts of the proposal. The waters off the West Lewis coast not only host a diverse marine ecosystem but also

support an active fishing industry. However, the application fails to sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A critical issue is the unfounded assumption that fishing activities can be displaced without any repercussions. The lack of evidence to show that there are alternative fishing grounds that are accessible and capable of supporting the added pressure is particularly alarming. This gap in information is crucial, as the risk of overfishing in other areas poses potential economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, it becomes impossible to understand the true impacts on fisheries and the livelihoods they support.

The proposal also poses significant risks to marine species, especially due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended period is likely to cause widespread disturbance, affecting species such as dolphins. The predicted disturbance to a large portion of the local bottlenose dolphin population raises substantial concerns, yet the application tends to minimise the significance of these effects, lacking sufficient supporting evidence.

Moreover, there is a troubling inconsistency within the application that acknowledges the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction severely undermines the credibility of the assessment and brings into question its compliance with the Habitats Regulations, particularly where harm is expected to the extent that legal authorisation is required.

The assessment does not adequately account for cumulative impacts arising from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains uncertain.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as outlined by statutory duties, national policy, and evidential criteria. This application revisits the core issues that led to the

refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is now presented under a strengthened policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data render the application inadequate and unreliable for determination. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of significant impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—result in an incomplete Environmental Impact Assessment. This incompleteness obstructs a thorough understanding of likely significant effects and residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment is a material omission that hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal is also incompatible with National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural places, or cultural heritage. It fails to prove that health and wellbeing impacts are acceptable and lacks evidence of net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, some of which are internally inconsistent, do not meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

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

Considering these factors, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or employ the relevant regulatory provisions to mandate the submission of the missing information.

In light of these substantial issues, a formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Additional Comments

I do not believe that there has been enough consideration given to significant benefits which should be payable to the local community, along with subsidised electric to recognise the impact to the Islands.

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: 5C5C711F

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. It stems from a thorough examination of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural elements. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively untouched natural environment, and rich cultural identity. The dimensions, proximity, and design of this project raise serious questions about its alignment with statutory requirements, national policy, and the principles underpinning sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is sparse and inconsistent, and critical components of the proposal remain unspecified. The employment of a flexible design framework obscures an understanding of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the provided documentation does not allow for a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are unsupported by solid evidence.

There are evident and substantial conflicts with policy. 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 does not adequately demonstrate compliance with national requirements intended to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the competent authority's capacity to ascertain the development's acceptability in policy terms.

The proposal's scale is unprecedented for this location, with large turbines sited near the shoreline, provoking substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, 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 circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is significantly lacking and fails to provide a complete, transparent, or reliable account of the potential environmental effects associated with the proposal. The adoption of a flexible Project Design Envelope, without fixed commitments to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty and hampers the ability to apply a worst-case scenario consistently. This situation undermines the integrity of the assessment, obscuring the true extent of environmental effects from both the public and the competent authority.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Consequently, consent is sought on the premise that environmental harm will be mitigated 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 procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly prior to determination.

Furthermore, there are notable evidential shortcomings, including insufficient baseline data, methodological limitations, and an over-reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the assessment of alternatives is a significant concern, as it does not fulfil the statutory requirements set by the Environmental Impact Assessment regime. The application provides a narrative account of the project's development rather than a structured, reasoned comparison of viable alternatives based on their environmental

impacts. This failure raises questions about whether less harmful options have been adequately identified, assessed, and prioritised over more damaging solutions.

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

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

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

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment constitutes a significant omission, contributing to the overall assessment that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species 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 ornithological assessment associated with the development proposal is fundamentally flawed, containing significant gaps in evidence and inconsistencies that question its conclusions. This proposed development is situated on the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are located nearby, yet the assessment fails to properly evaluate the risks of displacement, collision, and habitat loss.

There exists a notable contradiction in the application. The developer claims no significant adverse effects will result from the project while simultaneously advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, revealing that the conclusions drawn are not backed by solid evidence.

Furthermore, the assessment lacks adequate proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be negatively impacted. The critical nature of these feeding grounds is not fully acknowledged, and the reliance on modelling introduces uncertainty. This is particularly concerning for species in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given that baseline data is incomplete and the behavioural responses of these birds are not fully understood.

The proposed turbine siting within a recognised migratory corridor introduces further risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor, particularly concerning species with small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to assert that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, combined with data deficiencies and limitations in modelling, indicates that the assessment has not reached the standard of beyond reasonable scientific doubt. This invokes the precautionary principle and undermines the legality of a conclusion in favour of consent.

In summary, the identified deficiencies highlight a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Altogether, the assessment is deemed unreliable due to inconsistencies, methodological weaknesses, and insufficient evidence. These issues hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally flawed, as it does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are interconnected. The approach taken in the application reduces heritage to mere isolated assets, neglecting their ongoing cultural, spiritual, and social significance within the community.

A major shortcoming is the treatment of culturally significant sites, such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites are active burial grounds and places of spiritual practice, yet they are classified as static features in the assessment. This mischaracterisation fails to account for their continued use, the significance they hold, and the implications of development on their surroundings. Consequently, this results in an incomplete understanding of the cultural effects and ignores their importance to community life.

Moreover, the application overlooks intangible cultural heritage elements, including the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These factors are integral to the area's identity, yet they are completely absent from the assessment, creating a significant gap. Without these considerations, the cultural impact of the proposed development cannot be accurately gauged.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity recognised as characteristics of an Indigenous People, but there has been no process of Free, Prior and Informed Consent implemented. The lack of meaningful engagement undermines the legitimacy of the assessment and does not adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural issue is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot legally assess the social, cultural, and economic impacts on the island community. This omission alone renders the determination of the proposal unlawful.

From a policy perspective, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to address both tangible and intangible heritage and to acknowledge living cultural practices represents a significant departure from policy requirements.

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a substantial evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not provide an adequate foundation for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with this development is alarmingly insufficient and lacks the necessary transparency for an effective evaluation. While the developer conducted a Social Impact Assessment that included focus groups with local residents, the full report has not been made public. This lack of disclosure creates a significant evidential gap, obstructing both the public and the competent authority from grasping the complete range of social risks identified in the developer's own study.

Available summaries reveal that local residents are already dealing with measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These issues arise directly from engagement with the community, thus they cannot be dismissed as speculative. Nonetheless, the absence of the comprehensive assessment hinders proper scrutiny of these findings and restricts the

ability to evaluate their significance in the decision-making process.

Moreover, there is clear evidence that this proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Unfortunately, these detrimental impacts have not been adequately reflected in the primary application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the actual human and social costs of the project.

This lack of transparency has severe implications for the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially when the character and functionality of the community may be jeopardised. By failing to provide the complete dataset, the application does not offer a thorough evidential basis for weighing the benefits against potential harm.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm, yet the evidence currently available points to existing adverse effects that have not been fully revealed. Without the complete assessment, it cannot be demonstrated that the application meets this crucial policy requirement.

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 entire Social Impact Assessment. This omission constitutes a material flaw within the application, failing to satisfy the evidential prerequisites of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking, failing to capture the extent of change or the sensitivity of the environment involved. The character of the West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would impose a continuous and dominant industrial presence, thus fundamentally transforming this character and resulting in an irreversible alteration of the landscape.

The application does not sufficiently convey the magnitude of the anticipated visual change. The size and proximity of the turbines are such that they would dominate the views from residential areas, historic sites, and popular coastal locations. This would

negatively impact visual amenity and degrade the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within the context of a sensitive landscape.

There are methodological issues concerning the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly with respect to vital cultural heritage sites and high-value landscapes. This raises concerns that the magnitude of visual impact has been understated, thus compromising the reliability of the assessment.

Another major shortcoming is the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape framework, linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these sites in isolation, neglecting their interdependence, which results in an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Consequently, the resulting change is fundamental and permanent, incapable of being reduced to an acceptable level through any mitigation efforts.

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, nor the interconnectedness of landscape and heritage. These deficiencies hinder a reliable evaluation and firmly establish the conclusion that the proposal is incompatible with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline features clean coastal waters and important habitats that are sensitive to disturbances and contamination. The assessment of construction and pollution risks associated with the proposed project is incomplete, lacking the

necessary detail to properly evaluate the likely environmental effects. The proposal includes substantial seabed preparation and installation works within a high-energy 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 would be formulated after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

There are acknowledged risks in the application, such as sediment mobilisation and accidental chemical or oil spills, but it fails to provide enough detail on how these risks will be prevented, controlled, or monitored. Additionally, uncertainty surrounds the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats that have already been identified as sensitive.

The absence of detailed emergency response procedures further complicates the issue. By postponing contingency planning until after consent, the application makes it impossible to evaluate whether proper safeguards are established to handle pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, deferring critical environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and required mitigations must be evaluated prior to granting consent; without this information, a lawful determination cannot be made. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents a concerning lack of robust evaluation regarding fisheries and marine life, failing to adequately assess the ecological or socio-economic impacts that may arise from the proposed development. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not convincingly demonstrate how these critical habitats and industries can be preserved or sustained without considerable disruption.

One significant issue lies in the assumption that fishing activities can be displaced without repercussions. The absence of evidence indicating that alternative fishing grounds are both available and capable of accommodating the added pressure is a critical flaw. This oversight has the potential to lead to overfishing in different areas,

which could adversely affect the local fishing fleet's economic stability. Without a thorough and evidence-based evaluation, understanding the impacts on fisheries and livelihoods remains elusive.

Moreover, 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 period is expected to disturb marine life across large distances, notably impacting species such as dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious concerns; however, the application tends to minimise the significance of these impacts without adequate supporting evidence.

There exists an inconsistency within the application itself, acknowledging the requirement for licences to permit harm to European Protected Species while simultaneously describing such impacts as negligible. This contradiction calls into question the credibility of the assessment and raises compliance issues with the Habitats Regulations, especially given the anticipated harm that may necessitate legal authorisation.

Furthermore, the assessment neglects to consider cumulative impacts that could arise from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is vital to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby undermining any assertion that the proposal constitutes sustainable development.

In summary, the combination of insufficient evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal inconsistencies renders the assessment inadequate and unreliable. These deficiencies hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally deficient, failing to recognise the comprehensive impacts resulting from what constitutes a single integrated project. The offshore turbines and the onshore works are closely interconnected; however, their assessment is conducted in isolation. This fragmented approach obscures the overall environmental and socio-economic ramifications.

Included within the onshore works are the installation of cabling across protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of necessary access infrastructure through sensitive landscapes. These activities require excavation across areas of deep peat, particularly in Barvas Moor,

which serves as a significant carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus inhibiting a complete understanding of the project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application fails to facilitate an accurate assessment of cumulative effects. The Environmental Impact Assessment process stipulates that all elements of a project should be considered collectively. The division of offshore and onshore components results in an incomplete understanding of the combined effects on peatlands, habitats, and communities.

Additionally, the proposal poses considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the impacts on these habitats have been fully evaluated, nor does it indicate that effective avoidance measures have been implemented. This results in a notable evidential gap concerning biodiversity protection.

Concerns are also raised about the project's carbon balance. Disturbances to peatland can lead to the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this matter and fails to confirm that the overall carbon balance remains advantageous.

Furthermore, the routing of infrastructure across active croft land introduces potential conflicts with existing land use and legal rights. The application does not present evidence that the necessary consents or procedures have been initiated, which raises doubts about the project's deliverability and legal compliance.

From a policy standpoint, the inability to assess the project as a cohesive whole and to demonstrate adequate protection for peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The failure to establish that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism appeal. The proposal includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and disruptive "wall of light" effect that would drastically change the night-time

environment.

This application fails to evaluate how such lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This neglect is particularly troubling given the importance of dark skies to the local identity and the emerging tourism sector focused on astro-tourism. Consequently, there is a pronounced gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any assessment of lighting impacts or a phototaxis study, failing to address how aviation lighting could affect these species or potentially raise mortality rates.

This issue is further compounded by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and its associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would suffer adverse impacts. The standard of evidence required to exclude such adverse effects beyond reasonable scientific doubt remains unmet, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. Furthermore, it diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time is an essential element of the environment.

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

TOURISM

The assessment of tourism impacts within the application is fundamentally inadequate, failing to address the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism thrives on the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While it is noted that 86% of visitors are attracted by the scenery, the application neglects to provide a quantified analysis of how the introduction of large-scale offshore infrastructure may influence visitor numbers, their behaviour, or the overall economic contributions derived from

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 approximately 16% of the island's economy. However, the application does not model the potential impacts of seascape industrialisation and the corresponding decline in environmental quality on Tourism Gross Value Added or the broader economic resilience of the area. The absence of such analysis leaves unclear whether the development would provide a net economic benefit or pose a risk to an established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. This is particularly relevant for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, resulting in a substantial oversight regarding the implications for a recognised and burgeoning segment of the local economy.

Considering that the island community possesses limited economic diversification, the neglect to evaluate the impacts on tourism carries broader consequences for employment, local enterprises, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been appropriately addressed, contrary to the requirements outlined in the Islands (Scotland) Act 2018.

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

In summary, the collective shortcomings in quantifying tourism impacts, examining environmental factors that influence visitor behaviour, and considering the economic dependency of the island result in a significant evidential gap. This deficiency obstructs a thorough assessment of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm must be evaluated in light of its failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. It reflects the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data are present, undermining the reliability of the evidential

basis for determination. The proposal employs an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks completeness, inhibiting a comprehensive understanding of significant effects and residual impacts.

The procedural shortcomings are also significant. The absence of a compliant Island Communities Impact Assessment constitutes a breach of the Islands (Scotland) Act 2018. Moreover, the failure to provide a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues render the application unfit for determination.

Furthermore, the proposal conflicts with National Planning Framework 4, lacking adequate demonstration of biodiversity protection, natural area preservation, and cultural heritage safeguarding. It does not prove that health and wellbeing impacts are acceptable, nor does it present evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has been inadequately addressed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful determination that the impacts are acceptable.

Additionally, the proposal would inflict substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism will result in permanent changes that cannot be sufficiently mitigated.

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

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

Additional Comments

I am a Lewisman and while I don't live there now I frequently visit my home and I am appalled at this Industrialisation of my island and all the potential environmental and well-being damage it will bring to the sea, land and local people 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: FD832F7B

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

Dear Sir/Madam

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

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is insufficient and fails to deliver a comprehensive, transparent, or dependable account of the anticipated environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders the consistent application of a worst-case scenario. This compromises the assessment's integrity, meaning that the impacts outlined may not accurately represent the development that will eventually be constructed. Consequently, both the public and the competent authority are deprived of a clear understanding of the true environmental effects.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought with the assumption that environmental harm will be managed at a later date. This prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. The deferral of crucial information to stages post-consent is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be thoroughly established before determination.

There exist significant evidential shortcomings, such as gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These deficiencies lead to uncertainty regarding the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot be aligned with statutory requirements.

As a result, the application does not meet the evidential standards set forth in the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes stipulations related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

Overall, the combination of reliance on an undefined design envelope, the absence of specific mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, thereby preventing the competent authority from making an informed decision based on the information presented.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the development proposal is fundamentally flawed, containing significant gaps in evidence and inconsistencies that question its conclusions. This proposed development is situated on the west coast of

the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the application does not adequately demonstrate that these species will remain unaffected. Key foraging areas and migratory pathways are located nearby, yet the assessment fails to properly evaluate the risks of displacement, collision, and habitat loss.

There exists a notable contradiction in the application. The developer claims no significant adverse effects will result from the project while simultaneously advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, revealing that the conclusions drawn are not backed by solid evidence.

Furthermore, the assessment lacks adequate proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be negatively impacted. The critical nature of these feeding grounds is not fully acknowledged, and the reliance on modelling introduces uncertainty. This is particularly concerning for species in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially given that baseline data is incomplete and the behavioural responses of these birds are not fully understood.

The proposed turbine siting within a recognised migratory corridor introduces further risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor, particularly concerning species with small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to assert that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, combined with data deficiencies and limitations in modelling, indicates that the assessment has not reached the standard of beyond reasonable scientific doubt. This invokes the precautionary principle and undermines the legality of a conclusion in favour of consent.

In summary, the identified deficiencies highlight a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Altogether, the assessment is deemed unreliable due to inconsistencies, methodological weaknesses, and insufficient evidence. These issues hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is severely lacking, particularly in its failure to recognise the West Lewis coastline as a vibrant cultural landscape deeply intertwined with language, tradition, environment, and community.

The application adopts a simplistic view, treating heritage merely as a collection of disconnected, unchanging assets rather than acknowledging their active social, cultural, and spiritual roles in the lives of the community.

There is a notable shortcoming in how culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, are addressed. These locations serve as active sites for burial and spiritual practice, yet they are portrayed as static entities in the assessment. This oversight neglects their ongoing significance, use, and the potential impact of development on their surroundings, leading to an inadequate evaluation of the cultural implications and ignoring their importance in community life.

Additionally, the assessment fails to take into account the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring bond between the community and the coastal environment. These elements are vital to the area's identity, yet they are entirely omitted from consideration, representing a considerable gap in understanding the cultural ramifications of the development.

Concerns also arise regarding community rights and the necessity for genuine engagement. The Gaelic-speaking population, possessing a unique cultural identity akin to that of Indigenous Peoples, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement diminishes the credibility of the assessment and disregards established norms for participation in decisions that impact cultural and environmental matters.

Moreover, the absence of a compliant Island Communities Impact Assessment constitutes a significant procedural failure, as this is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately assess the social, cultural, and economic effects on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to recognise living cultural practices, signifies a blatant disregard for policy mandates.

In summary, the failure to thoroughly evaluate living heritage, intangible cultural values, community rights, and compliance with statutory requirements leads to a significant evidential gap. The cultural implications of the development remain inadequately assessed, and the application does not offer a solid foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks the necessary transparency for a lawful evaluation of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, but the full report remains unpublished. This creates a significant evidential gap that inhibits both public

understanding and the competent authority's ability to fully grasp the social risks identified through the developer's research.

Summaries of the assessment suggest that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not mere speculation. However, the absence of the full assessment hinders proper scrutiny of these findings and restricts the ability to evaluate their significance in the decision-making process.

Additionally, 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, such impacts have not been adequately integrated into the main application or given the appropriate consideration. Withholding the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the full dataset, the application does not present a complete evidential basis needed to assess the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments are expected to support positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that remain undisclosed. Without the complete assessment, demonstrating compliance with this policy is unfeasible.

The procedural implications are significant because 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 prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents a significant deficiency in assessing the impacts on seascape, landscape, and visual aspects, failing to accurately reflect the sensitivity of the environment and the extent of change that would occur. The West Lewis coastline is characterised by an open Atlantic horizon and an undeveloped nature that evokes a strong sense of remoteness. The introduction of large-scale turbines in proximity to the shoreline would establish a continuous industrial presence, drastically altering this

character and resulting in a permanent transformation of the landscape.

The visual change anticipated from this application is not adequately represented. The turbines' scale and closeness would dominate views from residential areas, historic sites, and popular coastal locations, which would lead to a direct impact on visual amenity and diminish the defining qualities of naturalness and remoteness. The assessment fails to properly convey the significance of this impact on such a sensitive landscape.

Concerns arise regarding the methods used to select and present visual viewpoints. Evidence suggests that the chosen viewpoints may not capture the perspectives of the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which undermines the assessment's reliability.

Furthermore, the assessment neglects the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape that is visually and spatially linked to the Atlantic horizon. By treating these assets in isolation, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of their setting and cultural significance.

The proposed industrialisation of the seascape would sever these crucial relationships, changing the context in which heritage assets are perceived and disrupting their connection to the natural horizon. This represents not merely a visual issue but broader cultural and spatial harm that has not been appropriately assessed within the application.

From a policy standpoint, the proposal contradicts the National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The magnitude of the proposed changes does not align with the requirement to protect landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a thorough worst-case assessment further questions the claim of compliance with policy.

It is evident that the impacts outlined cannot be effectively mitigated. The turbines' scale, height, and proximity would render their presence dominant and unavoidable. Consequently, the resulting transformation would be fundamental and permanent, incapable of being reduced to an acceptable level through mitigation.

Collectively, these points illustrate that the assessment inadequately represents the true scale of impact, the sensitivity of the environment, and the interrelated 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development involves onshore infrastructure that is fundamentally linked to offshore turbines; however, the assessment of these elements is materially incomplete. This separation results in a fragmented analysis that fails to capture the full extent of environmental and socio-economic impacts, obscuring the project's overall footprint. The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and the establishment of access infrastructure through sensitive landscapes, specifically involving excavation in areas of deep peat, notably within Barvas Moor, which is both a significant carbon store and an ecologically sensitive habitat.

The application neglects to provide a thorough assessment of these impacts, thereby hindering a comprehensive understanding of the project's environmental consequences. By deferring or excluding evaluations of onshore impacts, the assessment limits the analysis of cumulative effects, which is a requisite of the Environmental Impact Assessment process. The separate evaluations of offshore and onshore components fail to fully comprehend the combined effects on peatlands, habitats, and local communities.

Moreover, there are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not satisfactorily demonstrate that impacts on these habitats have been thoroughly evaluated or that sufficient avoidance measures have been implemented, resulting in a significant evidential gap concerning biodiversity protection.

The proposal further raises issues pertaining to carbon balance, as the disturbance of peatland may release stored carbon and create a carbon debt, which contradicts the objectives associated with renewable energy initiatives. The application does not sufficiently address this concern nor does it show that the overall carbon balance is maintained in a beneficial manner.

Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land uses and legal rights. The application lacks evidence that necessary consents or processes have been initiated, leading to uncertainties regarding both deliverability and lawful implementation.

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

Overall, the disconnection between project components, the lack of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this segment of the application incomplete and unreliable, obstructing a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal signifies a profound inadequacy in meeting the criteria for sustainable development as outlined by statutory obligations, national policy, and evidential benchmarks. This application reiterates the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to adequately address these concerns.

There are significant deficiencies in the evidential basis provided for this determination. Notable gaps exist in the baseline data, the design envelope remains undefined, and the reliance on unspecified mitigation measures raises concerns. Furthermore, there is a concerning omission of crucial impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of potential significant effects or residual impacts.

Additionally, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment is a material omission. These issues hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

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

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to significant and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the adverse effects on tourism are permanent consequences that cannot be effectively mitigated.

In summary, the application is procedurally and substantively unsuitable for determination. The myriad information deficiencies, along with policy inconsistencies and unresolved environmental risks, obstruct a lawful, evidence-based decision.

Therefore, the competent authority should either refuse consent on these grounds or invoke the relevant regulatory provisions to mandate the submission of the necessary information.

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

Additional Comments

I am very concerned that this is just an industrialisation of our Island that will mainly benefit Large corporations from other country's that don't have a vested interest in our country let alone our island. Profit above all else.

It will spoil the beauty and serenity of our coastline along with serious damage to seabeds and wildlife.

I believe that the majority of people on our island do not fully understand the true scale of this project and by the time they do there will be no coming back as

It'll be 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: BCF24CF5

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The scale of the proposal is unprecedented in this location, with large turbines positioned in close proximity to the shoreline. This introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact.

The application does not provide an adequate evidential basis for a lawful determination. Critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The use of a flexible design framework prevents a clear understanding of likely significant effects, while the reliance on mitigation measures that have not yet been specified means their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive conflicts with policy. The proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. Such conflicts directly affect the statutory tests required for consent and undermine the ability of the competent authority to conclude that the development is acceptable in policy terms.

Given the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. In these circumstances, the precautionary principle must apply. The development is located off the west side of the Isle of Lewis, an area defined by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns raised regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, failing to offer a comprehensive understanding of the ecological receptors within the West Lewis coastal environment. This area is a biologically active and highly sensitive marine system. However, the data collected is incomplete, and the methodologies employed

do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

A crucial oversight pertains to otters, classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the impacts of construction disturbance, noise, and increased activity remain unassessed. This oversight undermines any conclusions drawn regarding significant effects on this species.

Additionally, there are significant deficiencies in the evaluation of basking sharks, as the reliance on aerial surveys introduces a substantial detection bias, particularly under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that highlight frequent use of these waters. The neglect to incorporate or properly consider such evidence leads to an incomplete baseline, further weakening the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based 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 situation creates uncertainty about the actual risks posed to marine species and habitats.

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

In summary, the 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, further reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies that compromise its reliability from a regulatory standpoint. It fails to meet the evidential threshold necessary to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside evident data gaps and limitations in the modelling approaches, indicates that the required standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, thereby

precluding a lawful conclusion in favour of consent.

The ornithological assessment is flawed, exhibiting substantial gaps in evidence and internal inconsistencies that undermine its findings. The west coast of the Isle of Lewis is known to support internationally significant seabird populations, many of which are in decline. Yet, the application does not adequately demonstrate that these species will remain unaffected. The development is situated within key foraging areas and migratory pathways, yet the assessment fails to robustly evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental contradiction in the application, as the developer asserts that no significant adverse effects will occur while simultaneously advancing a Habitats Regulations derogation case, a requirement that arises only when significant harm is anticipated. This inconsistency raises questions about the credibility of the assessment and suggests that its conclusions are not substantiated by the underlying evidence.

Furthermore, the assessment lacks sufficient evidence regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling techniques injects uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in steep decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses remain poorly understood.

The location of the turbines within a recognised migratory corridor adds another layer of risk, effectively acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term consequences of sustained mortality within this corridor or the implications for species with relatively small global populations.

In summary, 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 provide evidence that internationally important seabird populations will not be adversely affected directly contradicts national policy. Taken together, these factors render the assessment unreliable due to methodological weaknesses, internal inconsistencies, and inadequate evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the assessment of social impacts, health, and wellbeing raises serious concerns about the application's compliance with necessary standards. The developer has commissioned a Social Impact Assessment, which included focus groups with local residents. However, the full report has not been made available, resulting in a significant evidential gap that hinders public understanding and prevents the competent authority from accurately assessing social risks identified in

the developer's research.

Current summaries suggest that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, derived from direct engagement rather than speculation. Yet, the withholding of the complete assessment restricts proper scrutiny of these findings and limits their significance within the decision-making process.

Furthermore, there is evidence indicating that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. These impacts have not been fully incorporated into the main application or given the weight they deserve. Thus, the failure to disclose the complete Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is essential for developments of this magnitude, especially when community character and functioning may be adversely affected. The omission of the full dataset results in an application that does not provide a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that remain undisclosed. Without the complete assessment, demonstrating compliance with this policy is unattainable.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a significant omission within the application and signifies a failure to meet the evidential standards of the Environmental Impact Assessment regime.

In summary, the failure to disclose the complete Social Impact Assessment, alongside evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This lack of information obstructs a lawful determination and supports the conclusion that the application is insufficiently substantiated.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped character that conveys a strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would create an overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

The application significantly underrepresents the magnitude of the visual change that

would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not adequately convey the level of impact or its significance, particularly given the sensitivity of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. Evidence indicates that some viewpoints may fail to adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the concern that the visual impacts have been understated, which undermines the credibility of the assessment.

Moreover, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets in isolation, rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

It is evident that the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and dominant. Consequently, the resulting changes would be fundamental and permanent, unable to be reduced to an acceptable level through mitigation measures.

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

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, resulting in an inadequate evaluation of ecological and socio-economic impacts. The waters off the

West Lewis coast are home to a rich marine ecosystem and a thriving fishing industry, yet the proposal does not provide assurance that these vital habitats and activities can be preserved without causing significant disruption.

A critical concern is the presumption that fishing operations can be relocated without any adverse effects. The application fails to supply evidence that alternative fishing areas are not only available but also accessible and able to accommodate additional fishing pressure. This gap in information is crucial, as the risk of overfishing in other regions could have wider economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment means the impacts on fisheries and local livelihoods remain obscured.

Moreover, the project poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The extended high-energy hammer piling is anticipated to disturb marine life over significant distances, including local dolphin populations. Concerns about the potential impact on a large portion of the bottlenose dolphin community have been raised, yet the application downplays these effects without adequate supporting evidence.

There is a marked contradiction within the application, acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously categorising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal clearance.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive evaluation of these interconnected effects, the overall repercussions for marine ecosystems and socio-economic conditions cannot be accurately assessed.

From a policy standpoint, the proposal fails to demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or that it can avert unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal signifies sustainable development.

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

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

I feel that this proposed development will bring very little to the Islands or the Islanders but have a massive negative impact on many ways.

Significantly the marine life and ecology will have unforeseeable changes imposed by the construction and running of this development. My particular concern is the abundant cetacean population which primarily uses underwater sound to navigate and communicate. Large fields of turbines will have a profound effect on these intelligent and sometimes rare animals.

I am also concerned about the almost permanent effect this will have on a mostly unspoilt landscape. The area of the Western Isles is famous for being an unspoilt landscape but having this development will impact this along a significant portion of the coastline.

I also feel that there will be an impact during the construction as a large workforce will need to be brought in to complete the construction. This will potentially destabilise the local economy and could have very long lasting repercussions. Transport links and local infrastructure are not set up to cope with the extra load of temporary workers.

There is very little benefit to the residents of the island. Despite all of the potential turmoil and almost permanent changes to the ecology, landscape and way of life we will still be paying more for electricity than the majority of the UK. It seems that because we are a relatively small population our voices are being ignored and our needs not considered.

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: 225542FB

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment requirements. The objection arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a rich cultural heritage. The magnitude, proximity, and design of the project raise serious doubts about its alignment with statutory obligations, national policies, and sustainable development principles.

Crucial environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain unclear. The proposal employs a flexible design framework, which hinders a comprehensive understanding of potential significant effects. Moreover, the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the available documentation does not allow for a thorough understanding of the environmental, cultural, or community impacts, and the assertions of negligible or insignificant effects lack solid evidence.

The application demonstrates evident policy conflicts. It appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It has not shown that it meets national requirements for safeguarding biodiversity, climate considerations, and environmental integrity. These conflicts are critical to the statutory tests necessary for granting consent and call into question whether the development can be deemed acceptable in policy terms.

The unprecedented scale of the proposal, with substantial turbines positioned in close proximity to the shoreline, raises significant issues regarding landscape capacity, visual impact, and environmental effects. Collectively, the lack of sufficient information, dependence on undefined mitigation measures, evidential shortcomings, and clear non-compliance with policy requirements illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to its materially inadequate assessment of alternatives. Instead of providing a structured and reasoned comparison of realistic alternatives based on their environmental effects, it offers a narrative account of project evolution.

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

There is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The significance of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of such analysis hinders any conclusion that the proposed siting is the least damaging option.

The shortcomings also extend to the assessments of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been applied, with undue reliance instead placed on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

limitation undermines any conclusions drawn regarding the absence of significant effects on the otter population.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is fundamentally flawed, characterised by internal inconsistencies and significant gaps in evidence that compromise its validity. The Isle of Lewis, particularly along its west coast, is home to internationally important seabird populations that are already experiencing declines. The application does not adequately demonstrate, to the necessary evidential standard, that these species will remain unaffected. Key foraging areas and migratory pathways are impacted by the proposed development; however, the assessment fails to sufficiently evaluate the risks of displacement, collision, or habitat loss associated with this siting.

A critical contradiction arises within the application, as the developer claims no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only relevant when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions are not substantiated by the available evidence. Furthermore, the

application lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be adversely affected. The significance of these feeding grounds is inadequately acknowledged, and the reliance on modelling introduces uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate potential mortality, especially given the incomplete baseline data and the inadequate understanding of behavioural responses.

The positioning of turbines within a known migratory corridor significantly heightens risk, creating a barrier along a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential criteria necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, which ultimately prevents a lawful conclusion that would support consent.

The identified deficiencies also signal non-compliance with National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Overall, the assessment is rendered unreliable due to its internal contradictions, methodological inadequacies, and lack of robust evidence, which collectively prevent a comprehensive evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal under consideration presents significant deficiencies in its assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a living cultural landscape, where the environment, language, tradition, and community are interconnected. Instead, the application adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

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

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

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

Additionally, a critical procedural failure is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings acknowledging "cultural loss." Despite this recognition,

these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the interconnectedness of landscape and cultural heritage is significantly lacking and does not sufficiently consider the sensitivity of the receiving environment. The proposed large-scale turbines near the West Lewis coastline would introduce a continuous industrial presence that would fundamentally alter the area's undeveloped character and open Atlantic horizon. This change would result in a permanent and irreversible transformation of the landscape.

Moreover, the application inadequately represents the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and sense of remoteness that define this region. The assessment fails to convey the true significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key

cultural heritage sites and high-value landscapes. This oversight poses a risk of underestimating the magnitude of visual impact, which undermines the assessment's reliability.

Additionally, there is a critical failure to evaluate the interconnected relationship among the landscape, seascape, and cultural heritage. Heritage sites, such as the Calanais Standing Stones and other Scheduled Monuments, are embedded in a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete understanding of the impacts on their cultural significance and setting.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This issue transcends visual impact, presenting a broader cultural and spatial detriment that has not been adequately addressed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which prioritises the protection of natural places and historic assets. The proposed scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further calls into question any assertions 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. Consequently, the anticipated change is fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of risks associated with construction and pollution is severely lacking, failing to provide the necessary detail for evaluating the likely environmental effects. The proposal includes significant seabed preparation and installation works in a high-energy Atlantic environment. However, it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans, relying instead on mitigation and contingency measures that are to be formulated after consent is granted. This reliance on unspecified future measures is particularly troubling, given the sensitive nature of the receiving environment.

The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk of sediment disturbance and contamination. Although the application

acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on how these risks will be effectively prevented, controlled, or monitored.

Moreover, there is significant uncertainty surrounding the extent 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 potential ecological effects or the duration of these impacts. This uncertainty raises additional concerns regarding the impact on marine species and habitats already identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. The decision to defer contingency planning to a post-consent stage obstructs the evaluation of whether adequate safeguards are in place for responding to pollution incidents. This creates procedural risks and undermines the ability of the competent authority to assess the effectiveness of environmental protection measures at the time of determination.

From a regulatory viewpoint, postponing essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandated that significant effects and mitigation measures must be evaluated before consent, and without this information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the deficiencies stemming from the absence of defined mitigation measures, lack of detailed management plans, and the uncertainty of potential impacts lead to a materially inadequate assessment. These shortcomings impede a comprehensive evaluation of construction and pollution risks, reinforcing 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 application regarding the project is fundamentally flawed, as it does not provide a complete assessment of onshore infrastructure. The offshore turbines are closely connected to the onshore works, yet these elements have been evaluated separately. This fragmented approach masks the true extent of the environmental and socio-economic impacts that this integrated project will have.

Key onshore components involve extensive cabling across protected moorland and the construction of a substation near Stornoway, along with necessary access routes that traverse sensitive landscapes. Excavation activities are set to occur across deep peat areas, particularly within Barvas Moor, which serves as a significant carbon store and a habitat of ecological importance. The lack of a thorough assessment regarding these impacts results in an incomplete understanding of the project's overall environmental footprint.

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

combined effects on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of assessment regarding dark skies and nocturnal wildlife represents a critical flaw within the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would create a visible and intrusive "wall of light" across the western horizon, risks fundamentally transforming the night-time environment.

Moreover, the proposal 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 region's identity and the growing tourism sectors, including astro-tourism. Consequently, there is a substantial gap in the overall landscape and environmental assessment due to these omissions.

A more pressing concern is the lack of evaluation regarding impacts on nocturnal wildlife. Numerous species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are known to be highly sensitive to artificial lighting. Such exposure can lead to disorientation and an increased risk of collision, yet the application does not incorporate any assessment of lighting impacts or a phototaxis study. The failure to consider how aviation lighting may affect these species or increase mortality is a significant oversight.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity and the associated risks. Other species, such as Kittiwakes, that may forage or migrate at night are also at risk of disorientation due to artificial lighting, yet this has not been properly assessed. The absence of site-specific night-time data creates a serious gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions conflict with the National Planning Framework 4, which pertains to the safeguarding of natural places and environmental quality. This deficiency also diminishes the overall 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 concerning dark skies and nocturnal wildlife represents a substantial evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for a lawful determination.

TOURISM

The tourism sector on the Isle of Lewis is crucial to the local economy, having seen substantial growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application lacks a thorough assessment of tourism impacts, failing to evaluate how large-scale offshore infrastructure would affect visitor numbers, behaviour, and overall economic contribution, despite acknowledging that 86% of visitors are attracted by the area's scenery.

Furthermore, the assessment does not consider how the industrialisation of the seascape and a potential decline in environmental quality could influence Tourism Gross Value Added or the economic resilience of the community. Without this analysis, it remains unclear whether the proposed development would provide a net economic benefit or jeopardise a vital and growing sector.

The report also overlooks the importance of environmental quality in enhancing the visitor experience, neglecting factors such as unspoiled landscapes and dark skies, which are essential to nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment further highlights the deficiencies in the evaluation, leaving a considerable gap in understanding its impact on a recognised and expanding segment of the local economy.

In a context where the island community has limited economic diversification, the lack of assessment regarding tourism impacts poses significant risks for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, as required under the Islands (Scotland) Act 2018, have not been addressed.

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

The cumulative failure to quantify tourism impacts, analyse environmental factors that drive visitor behaviour, and acknowledge the island's economic dependency results in a substantial evidential gap. This inhibits a robust assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

Clear procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide a full Social Impact Assessment constitutes a significant omission. These shortcomings hinder the

competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

This proposal is too close to shore & too large in scale.

Having grown up around the Westside of Lewis, I know what an area of natural beauty will be destroyed if this is allowed

Stop this now, whatever benefits are to be had will totally dwarf what is costs to the population and to avian & marine life. Plus the negative effects on tourism & health and wellbeing of all who will have their lives shattered by this.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 1EA4384C

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a review of the Environmental Impact Assessment Report and supporting documents, highlighting notable deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, nearly untouched environment, and significant cultural heritage. Concerns arise regarding the proposal's scale, proximity, and design in relation to its compliance with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are gaps in critical environmental data, while baseline information is both limited and inconsistent. Additionally, essential elements of the proposal remain unspecified. The application employs a flexible design framework, which obscures the understanding of potential significant effects. The reliance on yet-to-be-defined mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation falls short of facilitating a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by reliable evidence.

Substantial conflicts with policy are apparent. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and well-being. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests needed for consent and compromise the competent authority's ability to ascertain that the development aligns with policy expectations.

The unprecedented scale of the proposal poses significant challenges in this location, with large turbines planned in close proximity to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental consequences. Collectively, the deficiencies in information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy violations illustrate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies within the Environmental Impact Assessment Report are substantial and undermine its reliability as a measure of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks definitive commitments regarding turbine dimensions, layouts, or configurations, generates considerable uncertainty. This situation precludes a consistent application of a worst-case scenario analysis and ultimately compromises the integrity of the assessment. Consequently, the impacts presented may not accurately represent the development that will be constructed, thereby hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places excessive reliance on mitigation measures, monitoring strategies, and management plans that are not yet established. Seeking consent on the premise that environmental harm will be addressed in the future obstructs any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. This postponement of essential information to post-consent stages is procedurally unacceptable and contravenes the fundamental aims of the Environmental Impact Assessment framework, which necessitates that significant effects and their mitigations are clearly defined prior to any determination.

There are also significant evidential gaps, including insufficient baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of impacts, particularly in instances where conclusions of negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a thorough understanding of cumulative and worst-case impacts and fosters scientific uncertainty that is incompatible with statutory requirements.

As a result, the application fails to satisfy the evidential standards mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also does not demonstrate adherence to the National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an unspecified design envelope, the absence of concrete mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report not only unreliable but also incomplete. These significant deficiencies impede a lawful and comprehensive assessment of environmental effects, leaving the competent authority without the necessary information to properly evaluate the application.

ASSESSMENT OF ALTERNATIVES

The application significantly fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequate assessment of

alternatives. Instead of offering a structured comparison of viable options based on environmental effects, it provides a narrative of project evolution. This method does not sufficiently demonstrate that less harmful alternatives have been identified and evaluated in favour of more damaging options.

There is a notable absence of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be diminished. The sensitivity of the West Lewis coastline highlights the critical importance of proximity to shore in assessing impact, and the lack of this analysis makes it impossible to conclude that the proposed siting is the least damaging available option.

The inadequacies further extend to cable routing and landfall evaluation, where there is insufficient evidence to suggest that alternative routes have been adequately explored to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The failure to present a clear avoidance strategy or comparative analysis implies that mitigation by design has not been employed, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout decisions, and infrastructure routing. This oversight represents a breach of the established mitigation hierarchy and prevents the competent authority from assessing whether more suitable and less harmful alternatives are available. Without a thorough alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal exhibits significant deficiencies regarding the assessment of construction and pollution risks, which ultimately hampers a thorough evaluation of potential environmental effects. This application involves considerable seabed preparation and installation in a challenging Atlantic environment. However, it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be developed after consent has been granted, thereby obstructing any meaningful appraisal of their adequacy or effectiveness.

The application acknowledges risks associated with sediment mobilisation and

potential chemical or oil spills, yet it fails to furnish adequate details on how these risks will be prevented, controlled, or monitored. This lack of clarity is especially alarming in light of the sensitive nature of the receiving environment, particularly the West Lewis coastline, which is home to clean coastal waters and significant habitats vulnerable to sediment disturbance and contamination.

Furthermore, uncertainty remains regarding 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 repercussions of these effects. This uncertainty extends to the potential impacts on marine species and habitats identified as sensitive in the broader assessment.

The absence of specific emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application effectively inhibits an evaluation of whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and compromises the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the Environmental Impact Assessment regime requirements. Prior to consent, it is necessary to assess likely significant effects and related mitigations, and a lawful determination cannot be achieved in the absence of such information. Additionally, the application does not demonstrate compliance with policy obligations concerning environmental protection and water quality.

In summary, the incomplete assessment arising from the lack of defined mitigation measures, absence of detailed management plans, and uncertainty regarding potential impacts renders the overall evaluation of construction and pollution risks materially deficient. These failings underscore the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is deficient and fails to acknowledge the full range of impacts resulting from a single integrated project. Onshore works, which include cabling across protected moorland, the construction of a substation near Stornoway, and associated access routes through sensitive landscapes, are intrinsically linked to the offshore turbines. However, these components are evaluated separately, leading to a fragmented assessment that obscures the true environmental and socio-economic consequences.

These onshore activities involve excavation in areas of deep peat, notably within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The application does not adequately assess these impacts, inhibiting a comprehensive understanding of the project's overall environmental footprint. By neglecting or postponing the evaluation of onshore effects, the application prevents an accurate assessment of cumulative impacts. The Environmental Impact Assessment process stipulates that all

elements of a project must be examined collectively, yet the distinction between offshore and onshore aspects obscures the combined effects on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which hold policy protection. The application falls short in demonstrating that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, resulting in a clear evidential gap regarding biodiversity protection.

Concerns also arise around carbon balance; the disruption of peatland can release stored carbon, potentially creating a carbon debt that undermines the aims of renewable energy development. The application lacks a sufficient examination of this matter and fails to prove that the overall carbon balance remains advantageous.

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, leading to uncertainties regarding the deliverability and lawful execution of the project.

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

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

TOURISM

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

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

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

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

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

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

SUMMARY

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

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

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact

Assessment represents a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Moreover, the proposal is at odds with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural habitats, and cultural heritage, fails to validate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, thereby obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

Furthermore, the proposal is poised to cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the implications for tourism signify permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

To the agency concerned with Planning Approvals:

I am not anti-renewable energy sources. I am however against the siting of such infrastructure in remote areas of immense natural beauty and ecological value. I am against such projects when the investors who stand to profit have no stake in the local community, which is where the negative impacts will be felt. I am opposed to such projects when the investors who stand to profit are using our landscape as a cash cow. I cannot support a development for which no grid capacity exists, and for which the UK tax payer will be paying a subsidy to the developer for energy which cannot be used.

There are suitable sites for wind-power developments - and they should be closer to the consumers who will use the energy, where the demand can be satisfied.

They should not be on the Atlantic Fringe, in a pristine marine environment, far away from offices of the investment persons, the living rooms and kitchens of consumers, or the hives of industry. Many things should remain inviolate and sacred - and this environment and the people who cherish it are in that category.

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: 8672F740

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the proposal's scale, proximity, and design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust support.

Substantial conflicts with policy are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to determine the development as policy-compliant.

The unprecedented scale of the proposal raises significant concerns, with large turbines planned in close proximity to the shoreline, leading to issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and cannot support a lawful determination. In this context, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete, failing to provide a full, transparent, or reliable account of the likely environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and hinders a consistent application of a worst-case scenario. This compromises the integrity of the assessment, preventing both the public and the competent authority from comprehending the true extent of environmental impacts.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that remain undefined. This deferral means that environmental harm is expected to be addressed post-consent, inhibiting any meaningful evaluation of effectiveness or assessment of residual impacts. Such a process is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established prior to determination.

Significant evidential deficiencies also exist, including gaps in baseline data, limitations in methodology, and reliance on assumptions instead of 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 adequate 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.

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

In conclusion, the combination of an undefined design envelope, absence of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report fundamentally flawed. These deficiencies obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

The proposed application does not satisfy the requirements set out by the Environmental Impact Assessment regime regarding the assessment of alternatives. It fails to provide a structured and evidence-based comparison of viable alternatives based on their environmental impacts. Instead of demonstrating that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions, the application offers a narrative of project development.

There is a notable absence of transparent comparisons regarding alternative offshore locations, different scales of development, or various design configurations. Specifically, the application does not show that the developer has genuinely considered placing the turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The importance of the West Lewis coastline and the critical nature of proximity to shore in evaluating impact make this lack of analysis significant, as it hinders any determination that the proposed site is the least damaging option.

The inadequacies also extend to the evaluation of cable routing and landfall, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors, including culturally and spiritually important sites such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been prioritised, with an overreliance on post-design mitigation strategies instead.

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

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a critical omission that leads to the conclusion that the application has not undergone adequate evaluation and cannot be legally approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding the adequacy of the assessment of marine ecology and protected species within the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the provided baseline data is insufficient, and the methodologies employed fail to thoroughly capture species presence, behaviour, and habitat use. Consequently, the assessment does not deliver a reliable evidential basis for evaluating potential impacts.

A notable shortcoming is the treatment of otters, which are classified as a European Protected Species. The application does not appropriately acknowledge or assess their use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, the potential effects of construction disturbances, noise, and increased activity have not been sufficiently evaluated. This oversight calls into question any conclusions drawn regarding the absence of significant effects on otters.

Furthermore, the assessment of basking sharks exhibits deficiencies, primarily due to reliance on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This reliance is likely to lead to an underestimation of the species' presence, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider this relevant data results in an incomplete baseline, thereby undermining the reliability of the conclusions drawn.

These methodological inadequacies lead to assertions of negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of adequate baseline data further hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out in the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt and necessitates the application of the precautionary principle. In light of these factors, the granting of consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, containing significant gaps in evidence and internal contradictions that seriously undermine its conclusions. This area on the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not demonstrate to the necessary evidential standard that these species will remain unaffected. The proposed development is sited within key foraging areas and migratory pathways, yet the implications of potential displacement, collision risk, and habitat loss have not been adequately evaluated.

A critical inconsistency exists within the application; the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and suggests that the conclusions drawn are unsupported by the underlying evidence. Furthermore, the assessment fails to provide adequate evidence that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will not be negatively impacted. The importance of these feeding grounds is insufficiently acknowledged, and the reliance

on modelling approaches introduces uncertainty, especially concerning species such as Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not fully understood.

The siting of turbines within a recognised migratory corridor presents an additional, significant risk, effectively 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 effects of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory viewpoint, the application does not satisfy the evidential threshold necessary to confirm 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, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, preventing a lawful conclusion that would support consent.

The identified deficiencies reflect 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 be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape where tradition, language, community, and environment are deeply intertwined. The assessment treats heritage as a collection of isolated and static features, neglecting their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the assessment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are places of active burial and spiritual practice, yet the assessment fails to acknowledge their continued relevance, instead categorising them as mere static assets. This mischaracterisation leads to an incomplete analysis of cultural impacts and disregards their integral role in community life.

Moreover, the evaluation neglects intangible cultural heritage, including the Gaelic language and local traditions, as well as the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity but have been completely overlooked in the assessment, marking a significant gap in

understanding the cultural impact of the development.

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

Another critical oversight is the failure to conduct a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The failure to account for both tangible and intangible heritage, alongside the disregard for living cultural practices, signifies a clear deviation from established policy requirements.

Ultimately, the neglect of living heritage, intangible cultural values, community rights, and necessary statutory assessments results in a substantial evidential void. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application lacking a solid foundation for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the complete Social Impact Assessment significantly hampers the evaluation of social, economic, and health impacts associated with the proposed development. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the full report, which is a substantial omission within the application. This failure to provide comprehensive information undermines the Environmental Impact Assessment process.

Available summaries suggest that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These observations are based on direct engagement with the community and not mere speculation. However, the lack of transparency regarding the full assessment restricts proper scrutiny of these findings and limits the ability to assess their importance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this recognition, these social impacts have not been adequately

incorporated into the main application, nor have they been given the appropriate emphasis. The omission of the complete Social Impact Assessment obscures the true social and human costs of the development.

From a policy standpoint, the application does not adequately demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. Developments should enhance positive health outcomes and avoid harm, yet the evidence at hand suggests existing adverse effects that have not been fully revealed. Without the complete assessment, the application cannot confirm compliance with this policy.

Ultimately, the failure to disclose the full Social Impact Assessment, coupled with evidence of pre-existing negative impacts, results in an incomplete and unreliable evaluation. This lack of comprehensive information hinders a lawful determination and supports the conclusion that the application lacks sufficient backing.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application proposes the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. This proposal would create a continuous and dominant industrial presence that fundamentally alters the existing character, leading to a permanent and irreversible transformation of the landscape. The assessment provided does not adequately represent the scale of this visual change, which would dominate views from residential areas, historic sites, and popular coastal locations. This would significantly impact visual amenity and diminish the defining qualities of naturalness and remoteness, yet the assessment fails to convey the true level of impact or its significance within such a sensitive landscape.

Concerns arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests that the assessment may have understated the magnitude of visual impact, thereby undermining its reliability.

Moreover, the assessment does not properly consider the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, visually and spatially linked to the Atlantic horizon. Treating these heritage assets as isolated entities fails to acknowledge their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance. The industrialisation of the seascape would sever these relationships, altering the context in which these heritage assets are experienced and disrupting their connection to the natural horizon. This represents a broader cultural and spatial harm that remains inadequately assessed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4

regarding the protection of natural places and historic assets. The scale of the proposed changes contradicts the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

There is also uncertainty concerning the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without strong modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty includes potential effects on marine species and habitats already identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application fails to allow for a proper evaluation of whether suitable safeguards are in place to deal with pollution events. This creates procedural risks and undermines the capacity of the competent authority to review environmental protection measures at the point of determination.

From a regulatory standpoint, deferring essential environmental safeguards contradicts

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

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

FISHERIES AND MARINE LIFE

The proposal presents significant shortcomings in its assessment of marine life and fisheries, leading to an incomplete understanding of ecological and socio-economic implications. The waters off the West Lewis coast are known for both their rich marine ecosystem and an active fishing industry. However, the application fails to adequately demonstrate that these essential uses and habitats will be safeguarded against substantial disruption.

A critical concern arises from the unfounded assumption that fishing activities can be relocated without adverse effects. There is no evidence provided that alternative fishing grounds exist or can support the increased pressure that displacement would entail. This lack of information is crucial, as such displacement poses a risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The high-energy hammer piling expected over an extended period is likely to disturb a wide area, negatively affecting species such as dolphins. The anticipated disturbance to a considerable portion of the local bottlenose dolphin population raises substantial concerns, yet the application seems to minimise these impacts without adequate supporting data.

Additionally, the application demonstrates a notable inconsistency in its acknowledgment of the need for licences to permit harm to European Protected Species while simultaneously claiming that these impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially in situations where harm is expected to necessitate legal authorisation.

The failure to consider cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities, further complicates the assessment. 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 does not satisfy the requirements set forth in the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with current marine users or avert unacceptable impacts on marine biodiversity, hindering any conclusion that the proposal aligns with sustainable development principles.

In summary, the deficiencies in the evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment incomplete and unreliable. These issues obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly lacking, failing to address the full range of impacts associated with what constitutes a single integrated development. The offshore turbines and the onshore works are inherently connected; however, they are evaluated separately, leading to a fragmented approach that obscures the comprehensive environmental and socio-economic effects of the project.

The onshore components consist of cabling traversing protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is both a critical carbon store and an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the evaluation of onshore impacts, the application fails to allow for an accurate assessment of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in tandem, yet the division between offshore and onshore components means that the combined effects on peatlands, habitats, and communities remain inadequately understood.

Moreover, there are considerable risks to delicate habitats, such as machair systems and peatland environments that enjoy policy protection. The application does not sufficiently demonstrate that the potential impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place. This presents a substantial evidential gap in relation to the protection of biodiversity.

The proposal also prompts concerns about the carbon balance. Disturbing peatland releases stored carbon, which could create a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently tackle this concern or confirm that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or procedures have been initiated, leading to uncertainties

regarding deliverability and lawful implementation.

From a policy standpoint, the failure to consider the project in its entirety and to show protections for peatlands, habitats, and land use interests contradicts the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism value. The proposed project would introduce permanent red aviation lighting that is visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter 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 region's identity and the emerging tourism sector of astro-tourism, this omission is especially troubling.

Moreover, there is no evaluation of how this lighting would affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to examine how aviation lighting might impact these species or contribute to mortality rates.

Additionally, the ornithological assessment relies on daytime survey data, which does not capture nocturnal activity or the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. Without site-specific night-time data, there is a critical gap in understanding the ecological impacts.

The failure to consider nocturnal impacts raises significant concerns about whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate the absence of adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and thereby obstructing a lawful determination.

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

of the ecosystem.

In summary, the lack of assessment concerning dark skies and nocturnal wildlife creates a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot 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 application for the Spiorad na Mara Offshore Wind Farm presents serious issues regarding its compliance with sustainable development standards, statutory duties, and national policy. It mirrors the fundamental problems that led to the refusal of the Lewis Wind Power proposal in 2008, particularly concerning the unacceptable scale of industrialisation. This current proposal emerges within a stronger policy context that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to adequately address these critical areas.

Significant deficiencies in the application prevent a comprehensive evaluation. It lacks a complete and reliable evidential foundation, with notable gaps in baseline data, an undefined design envelope, unspecified mitigation measures, and overlooked impact pathways such as nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide insight into likely significant effects or residual impacts.

Furthermore, procedural inadequacies are evident. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the omission of a full Social Impact Assessment is a critical flaw. 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 directly contradicts the National Planning Framework 4, which necessitates the protection of biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been thoroughly assessed, leaving uncertainties regarding effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain significant and uncertain. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, contradictory. The evidential standard needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating a precautionary approach that prevents a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks inhibits a lawful, evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Additional Comments

This proposal could not have been positioned in a more unsuitable place. The location is inappropriate due to its scale, close proximity to our homes & communities, the negative effect it will have on the lives & wellbeing of impacted residents, & the natural beauty & wildlife.

The West Coast of Lewis is a wild & beautiful pristine coast but it is also a thriving home to many people, communities and businesses.

The largest, closest to shore turbines in the world 'experiment' will be located next to historic population centres and areas of unspoiled coastline & dramatic landscapes. This coast is truly magnificent & should be cherished not destroyed for a bit of shareholder profit hiding behind a 'green' ideal.

The area 'chosen' is not offshore; it isn't off the coast of a rundown mainland seaside town or former industrial estuary. It is one of the last truly wild places.

My family's home & Croft are right in the centre of this industrialisation, we will see, feel & experience this industrialisation for the rest of our lives (or however long we can tolerate). This is not OFFSHORE development; it is INSHORE, 3 miles from our home (which I am told wouldn't be allowed on land).

Our homes will be unsellable, our tourist business will be obliterated & most importantly for us, our grown up children who have returned to their home after working & studying on the mainland, have said they do not want to stay here if their beautiful home & coast is destroyed.

I urge the decision-makers to look beyond the initial perceived financial gain, or a mythical target.

Visit here and assess if this is the best place to locate and develop. I don't believe the sacrifice is worth it & neither do the majority of people surveyed living on the West Coast!

Northlands has said these giant turbines are designed to be 30 miles out to sea not in inshore waters. The only reason is to make it cheaper to install & operate- that alone should be enough to render this project an unviable solution.

The other 'N' developments, that are offshore earmarked, could be easily combined with already identified zones or even taken out beyond the shipping lanes.

Irresponsible, ill-considered locations for wind turbines bolster the arguments of anti-wind lobbies & turn the general public against all developments.

We are not anti-renewables, in Shawbost we host & benefit from our community turbine. We are against irresponsible location & overdevelopment, of which N4 is a shining example.

Please let sense prevail & throw this application out with as much disdain as the local population feels they have been treated.

From my home I see uninterrupted seascapes, stunning sunsets, fantastic dark skies, northern lights, sea eagles, migrating & resident avian life, dolphins, orcas & other whales - all in the area where industrialisation is proposed.

Allowing destruction on this scale will damage my future, my family life, my well-being, and my mental health, beyond any words I have.

Lewis has enough wind power already for its own needs, if that were the intention. This development benefits others (& a small minority here) and we should not be sacrificed to achieve it.

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: 22BB1D61

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 objection arises from an examination of the Environmental Impact Assessment Report and other relevant documents, revealing serious deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. There are fundamental issues regarding the scale, design, and proximity of the proposal in relation to statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential foundation for a lawful decision. There is a lack of critical environmental data, limited and inconsistent baseline information, and many aspects of the proposal remain undefined. The flexible design framework complicates the assessment of potential significant effects. Furthermore, the reliance on unspecified mitigation measures prevents an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack robust evidence.

Substantive policy conflicts are evident. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially regarding biodiversity, natural areas, cultural heritage, and public health. It does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests necessary for consent and hinder the competent authority's ability to determine if the development aligns with policy requirements.

The proposal's scale is unprecedented for this area, with large turbines located near the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental repercussions. In light of the insufficient information, reliance on unclear mitigation strategies, evidential shortcomings, and clear policy non-compliance, it is apparent that the application is incomplete and does not support a lawful decision. Therefore, the precautionary principle should be applied in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness and transparency to reliably convey the likely environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not

commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty undermines the assessment's integrity and hinders a consistent application of a worst-case scenario, thereby obscuring the true extent of potential environmental impacts from both the public and the competent authority.

Moreover, the application is heavily dependent on unspecified mitigation measures, monitoring strategies, and management plans, which have yet to be defined. Seeking consent under these circumstances, with the intention to address environmental harm at a later stage, impedes a meaningful evaluation of the effectiveness of these measures and hinders the assessment of any residual impacts. This deferral of critical information to post-consent phases is procedurally improper and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are also notable evidential shortcomings, such as gaps in baseline data, limitations in the employed methodology, and an overreliance on assumptions rather than site-specific evidence. This situation leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to the National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that adequate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposed application fails to demonstrate a proper assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental impacts, the application presents a narrative that outlines the project's evolution. This methodology does not establish that less harmful options have been adequately identified, assessed, and chosen over more damaging alternatives.

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

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

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

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fraught with significant deficiencies, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically active marine system, yet the baseline data provided is insufficient. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of the species within this ecosystem. As a consequence, the assessment does not furnish a credible evidential basis for evaluating potential impacts.

A critical oversight involves otters, which are classified as a European Protected Species. The application neglects to appropriately recognise and assess their active utilisation of coastal areas for foraging and movement. This omission regarding their

core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such shortcomings undermine any assertions regarding the absence of significant effects on this species.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider this data results in a deficient baseline, thereby weakening the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions drawn concerning negligible or non-significant effects are based on assumptions rather than solid evidence. Moreover, the lack of comprehensive baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

Ultimately, the amalgamation of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies impede a thorough evaluation of impacts on marine ecology and protected species, contributing to the overarching conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts associated with this development is fundamentally flawed. There are significant gaps in the evidence provided, as well as internal inconsistencies that undermine the validity of its conclusions. The proposal is situated within key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction within the application arises from the developer's conclusion of no significant adverse effects, while simultaneously putting forth a Habitats Regulations derogation case. This derogation is only necessary when significant harm is anticipated, raising questions about the reliability of the assessment and suggesting that its conclusions lack robust evidence. Furthermore, the assessment fails to

adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unharmed. The crucial feeding grounds associated with these species are not fully taken into account, and the reliance on modelling approaches introduces additional uncertainty, particularly concerning species that are severely declining, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor adds a significant risk, potentially creating a barrier in a primary flight path that is used 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 meet the evidential standards needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the requisite standard of beyond reasonable scientific doubt has not been attained. This situation engages the precautionary principle and obstructs a lawful conclusion that would support consent.

Additionally, the deficiencies identified suggest a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be negatively affected places the proposal at odds with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is not adequate. It does not recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are connected. The application takes a simplistic approach, viewing heritage as isolated, static assets instead of understanding their ongoing social, cultural, and spiritual roles in the community.

A significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These places serve as active sites for burial and spiritual practices, yet the assessment classifies them as unchanging features, overlooking their current use and significance, as well as the development's effect on their setting. This misunderstanding leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

The application also neglects to address intangible cultural heritage, including the

Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely missing from the assessment, which is a major oversight. Without considering these factors, it is impossible to fully understand the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement weakens 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 critical procedural failure in the lack of a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This alone prevents a lawful decision.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, as well as to acknowledge living cultural practices, deviates from policy requirements.

In summary, the failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been properly assessed, and the application lacks a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing assessment associated with the development is significantly lacking in transparency and substance. Although the developer commissioned a Social Impact Assessment that included local resident focus groups, the full report has not been made available. This omission creates a critical evidential gap, limiting public understanding and hindering the competent authority's ability to evaluate the social risks identified in the developer's own research.

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

Moreover, there is evidence suggesting that the proposal is seen as a threat to community identity and cohesion, with the developer's findings indicating a risk of

“cultural loss.” Despite these serious concerns, the full impacts have not been adequately addressed in the main application, nor have they been given the appropriate consideration. The failure to disclose the complete Social Impact Assessment obscures the true social and human costs associated with the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of the potential impacts on the seascape, landscape, and visual environment is significantly lacking and does not reflect the true scale of change nor the sensitivity of the area affected. The character of the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would result in a continuous and overwhelming industrial presence, fundamentally changing this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately depict the extent of the anticipated visual changes. Given the scale and proximity of the turbines, they 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 sufficiently illustrate this impact or its significance within the context of such a sensitive landscape.

Concerns also arise from the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the true magnitude of the visual impact has been underestimated, casting doubt on the reliability of the assessment.

A critical shortcoming is the lack of analysis regarding the interconnected relationship between the landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting connected visually and spatially to the Atlantic horizon. The assessment fails to acknowledge their interdependence, treating these heritage sites as isolated entities, which results in an incomplete assessment of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents a visual impact along with broader cultural and spatial damage that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly contradicts the principles outlined in National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The extent of change posed by the project is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further undermines any assertion of policy conformity.

It is evident that the impacts identified cannot be suitably mitigated. Due to the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, the resulting change is fundamental and permanent, incapable of being diminished to an acceptable level through any form of mitigation.

Collectively, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings obstruct a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is inadequate and lacks the necessary detail to evaluate potential environmental effects. The project entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. The application relies on mitigation and contingency measures that are to be formulated after consent has been granted, which hinders any meaningful assessment of their potential effectiveness.

This dependence on unspecified future measures raises particular concerns due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to provide adequate details on how these risks will be managed, controlled, or monitored.

There is also a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty affects potential impacts 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 undermines the ability to evaluate whether sufficient safeguards are in place to address pollution incidents. This creates procedural risks and compromises the competent authority's capacity to assess environmental protection measures at the time of decision-making.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted, and if this information is lacking, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of specified mitigation measures, detailed management plans, and uncertainty regarding possible impacts make the assessment materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks and support 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 proposal includes onshore infrastructure that is assessed separately from offshore turbines. This fragmented approach fails to capture the full extent of impacts from what is a single integrated project. The onshore elements consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and 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 deferring the assessment of onshore impacts, the application undermines the evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. However, by treating the offshore and onshore elements separately, the combined effects on peatlands,

habitats, and local communities are not fully comprehended.

There are significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been assessed or that avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue or show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions about its feasibility and legality.

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 in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further weakens the application.

Overall, 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, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and nocturnal wildlife is completely missing from the Environmental Impact Assessment, creating a significant omission. The proposed development introduces permanent red aviation lighting, which would be visible over long distances and create an intrusive "wall of light" effect along the western horizon. This would fundamentally alter the night-time environment.

Moreover, there has been no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is alarming, especially given the importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to address these impacts leads to a substantial gap in the overall assessment of landscape and environmental effects.

Even more concerning is the absence of an evaluation of impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm

Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a higher risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to evaluate how the aviation lighting might affect these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data for the ornithological assessment, which overlooks nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been taken into account. The lack of site-specific night-time data represents a critical deficiency in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard required to rule out negative effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and hindering lawful decision-making.

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

Collectively, the absence of any assessment concerning dark skies and nocturnal wildlife forms a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unsuitable for supporting a lawful determination.

TOURISM

The application inadequately assesses the potential impacts on tourism, which is a vital component of the Isle of Lewis economy. Tourism is deeply rooted in the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted to the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the economic contribution of tourism.

This sector has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and subsequent loss of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an essential and expanding sector.

Furthermore, the significance of environmental quality in promoting tourism is

neglected. The unspoiled landscapes and dark skies are crucial for enhancing visitor experiences and for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and burgeoning part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent to the area have not been adequately addressed, contrary to the requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It also runs counter to strategic objectives that prioritise tourism as a growth sector, failing to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This shortfall hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is lacking.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed when assessed against statutory duties, national policy, and evidential standards related to sustainable development. It echoes the key issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This current application is made under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing even more strongly.

The evidential basis for this application is incomplete and unreliable. Critical gaps exist in the baseline data, there is reliance on an undefined design envelope, and mitigation measures are unspecified. Additionally, key impacts such as those on nocturnal wildlife, full onshore infrastructure, and tourism effects have been omitted. As a result, the Environmental Impact Assessment falls short and does not provide a clear picture of likely significant effects or any residual impacts.

There are procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, not fully disclosing the Social Impact Assessment is a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is at odds with National Planning Framework 4. It does not show evidence of protecting biodiversity, natural places, or cultural heritage. There is also no assurance that health and wellbeing impacts are acceptable, nor is there evidence of a net economic benefit since tourism impact modelling is absent. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, leaving effects on peatlands, carbon balance, habitats, and crofting land obscure.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals lack completeness and contain inconsistencies. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion on the acceptability of impacts.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The volume of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should refuse consent for this application or utilise the appropriate regulatory measures to mandate the submission of the necessary missing information.

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

Additional Comments

This wind farm will have a dramatically detrimental effect on tourism across the island which a huge number of people rely on as a livelihood. It will affect people being able to sell their homes, reducing the prices they may be able to sell at but also meaning some houses may not sell at all. There is no benefit to the local community in any long term and meaningful way and they will be left with a damaged landscape and environment.

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: 3912C959

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. The application has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. This objection arises from an examination of the Environmental Impact Assessment Report and its associated documents, which reveal significant deficiencies in planning, environmental assessment, cultural considerations, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns have been raised regarding the scale, proximity, and design of the proposal, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful decision-making process. Essential environmental data is absent, the baseline information provided is both limited and inconsistent, and crucial elements of the proposal remain unclear. The flexible design framework used within the application inhibits a comprehensive assessment of potential significant effects, while the reliance on unspecified mitigation measures renders their effectiveness unassessable. Consequently, the documentation fails to facilitate a thorough understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust supporting evidence.

There exist substantive conflicts with established policies. The proposal is inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests required for consent, thereby compromising the competent authority's ability to conclude that the development adheres to policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual dominance, and environmental ramifications. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and incapable of sustaining a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and does not provide a thorough understanding of the ecological receptors involved. This marine system is biologically active and sensitive, yet the baseline data presented is incomplete, and the

methodologies used fail to accurately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight pertains to otters, a European Protected Species. The application does not sufficiently acknowledge their active use of coastal areas for foraging and movement. The assessment neglects to consider their core foraging ranges and behavioural patterns, which means the possible effects of construction disturbances, noise, and heightened activity have not been properly evaluated. This lack of attention undermines the findings concerning the absence of significant effects on this species.

Similarly, the assessment of basking sharks suffers from notable deficiencies, as it relies heavily on aerial surveys that introduce considerable 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 frequent usage of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline, further diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based on assumptions rather than sound evidence. The insufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty concerning the actual level of risk to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant flaws, characterised by evidence gaps and contradictions that undermine its validity. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately prove that these species will not be adversely impacted. The development site lies within critical foraging areas and migratory routes, yet the assessment fails to thoroughly evaluate the potential consequences of displacement, collision risk, and habitat loss.

There exists a notable contradiction in the application, as the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only arise when significant harm is anticipated. This inconsistency casts doubt on the assessment's credibility and suggests that its conclusions lack support from the underlying data. Furthermore, the assessment inadequately demonstrates that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars that are already in decline. The methodologies employed are likely to underreport mortality, especially where baseline data is lacking and behavioural responses are not completely understood.

The placement of turbines within a recognised migratory corridor significantly increases risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently consider the long-term impacts of continued mortality in this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to 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, along with gaps in data and limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and prevents a lawful conclusion that would support consent.

Moreover, the identified deficiencies illustrate a failure to comply 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 in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the application is fundamentally flawed, particularly concerning the treatment of the West Lewis coastline. This area is a dynamic cultural landscape where environment, language, tradition, and community are interwoven. Instead of recognising this interconnectedness, the application adopts a reductive view that portrays cultural heritage as merely a collection of static assets, neglecting their active social, cultural, and spiritual roles within the community.

A notable shortcoming is the handling of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet the assessment treats them as fixed features, ignoring their ongoing use and significance. This misrepresentation leads to an inadequate understanding of cultural impacts and overlooks the vital role these sites play in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are integral to the identity of the area, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural implications of the development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population possesses a unique cultural identity akin to that of an Indigenous People, but the absence of a Free, Prior and Informed Consent process compromises the integrity of the assessment. This lack of meaningful participation undermines the legitimacy of the findings and disregards established principles of engaging communities in decisions that affect their cultural and environmental interests.

Another critical procedural deficiency is the non-compliance with the statutory requirement for an Island Communities Impact Assessment as stipulated in the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic implications for the island community, thereby rendering any determination unlawful.

From a policy standpoint, these failures place the proposal in conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly deviates from established policy requirements.

In summary, the overall lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations leads to a significant evidential gap. The application has not properly assessed the cultural impacts of the development, resulting in an insufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of a complete Social Impact Assessment is a serious concern that undermines the evaluation of social impacts, health, and wellbeing related to this development proposal. Although the developer engaged local residents through focus groups, the full report has not been made available, creating a significant evidential gap. This lack of transparency hinders both the public and the competent authority from grasping the full extent of the social risks identified in the developer's own research.

Available summaries reveal that local residents are already feeling stress, anxiety, and concern as a result of the proposal's scale and proximity. These effects arise from direct engagement and are therefore not speculative. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the ability to assess their importance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with “cultural loss” explicitly noted in the developer’s findings. Despite this critical information, the impacts have not been adequately integrated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs of the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process itself. A thorough understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when they may affect community character and functioning. By failing to provide the full dataset, the application lacks a comprehensive evidential basis for weighing benefits against potential harm.

From a policy perspective, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments are required to promote positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application, failing to satisfy the evidential criteria of the Environmental Impact Assessment regime.

Collectively, the failure to disclose the full Social Impact Assessment, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and an undeveloped, remote character. The introduction of large-scale turbines near the shoreline would create a continuous and dominant industrial presence, fundamentally altering this character and resulting in a permanent 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 proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the naturalness and sense of remoteness that defines this area.

There are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning significant cultural heritage sites and valued landscapes. This raises the risk that the visual impact has been understated, thereby undermining the reliability of the assessment. Additionally, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected to the Atlantic horizon, but the assessment treats them as isolated assets, failing to acknowledge their interdependence and resulting in an incomplete evaluation of impacts on their cultural significance and setting.

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 not only represents a visual impact but also entails broader cultural and spatial harm that has not been adequately assessed in the application. From a policy perspective, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

The identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resulting change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation. Overall, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, which prevents a reliable evaluation and reinforces the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

Particularly alarming is this reliance on undefined future measures, especially given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide

sufficient detail on the prevention, control, or monitoring of these risks.

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

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

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; the absence of such information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the proposed project is fundamentally flawed due to its incomplete assessment of onshore infrastructure, which fails to recognise the interconnectedness of the offshore turbines and onshore works. This fragmented evaluation obscures the true magnitude of environmental and socio-economic impacts. Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure, all of which traverse sensitive landscapes. The planned excavation, particularly in areas of deep peat within Barvas Moor, threatens a significant carbon store and ecologically sensitive habitat. However, the current application does not provide a thorough assessment of these critical impacts, limiting understanding of the overall environmental footprint of the project.

The application's deferral or exclusion of onshore impacts obstructs proper evaluation of cumulative effects, which is essential for an accurate Environmental Impact Assessment. This process mandates that all elements of a project are considered collectively. The failure to integrate the offshore and onshore assessments means that the combined impacts on peatlands, habitats, and local communities remain largely

uncharted.

Furthermore, the proposal poses serious risks to delicate habitats such as machair systems and peatland environments that are already protected under policy. There is insufficient demonstration within the application that the impacts on these vital habitats have been thoroughly evaluated or that effective avoidance measures have been employed. This creates a significant evidential gap regarding biodiversity protection.

Additionally, the disturbance of peatland raises concerns about carbon balance, as it releases stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this issue nor does it prove that the carbon balance remains favourable.

The routing of the project infrastructure through active croft land also raises potential conflicts with established land use and legal rights. The lack of evidence that the required consents or processes have been initiated calls into question the project's viability and lawful execution.

From a policy standpoint, the disjointed assessment of the project and the failure to safeguard peatlands, habitats, and land use interests are at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be mitigated or avoided further undermines the application.

In summary, the disconnection of project components, the absence of comprehensive assessments, and the lack of substantiated evidence on environmental and land use impacts collectively render this aspect of the application inadequate and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism value. However, the proposal introduces permanent red aviation lighting that will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This is particularly concerning given the rising importance of dark skies to the identity of the area and the emerging tourism sector centred around astro-tourism.

Moreover, the application neglects to assess the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The absence of a lighting impact assessment or phototaxis study means that the application does not consider how aviation lighting may negatively affect these species or contribute to increased

mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates this issue, as it does not account for nocturnal activity or related risks. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

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

From a policy standpoint, the omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a crucial component of the ecosystem.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is procedurally and substantively unfit for determination, highlighting significant deficiencies in information and clear policy conflicts. The proposal fails to meet the requirements of sustainable development, not only in terms of statutory duties but also when measured against national policy and evidential standards. It echoes the unresolved core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, it is presented within a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data undermine the application, which uses an undefined design envelope and relies on unspecified mitigation measures. This lack of clarity extends to significant omissions, such as the failure to address impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, inhibiting an adequate understanding of potential significant effects or residual impacts.

There are also notable procedural shortcomings. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment represents a material omission. These issues obstruct the competent authority's ability

to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

The proposal directly conflicts with the National Planning Framework 4, as it does not adequately demonstrate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to provide acceptable evidence regarding health and wellbeing impacts, alongside a lack of tourism impact modelling that prevents a demonstration of net economic benefit. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thereby engaging the precautionary principle and blocking a lawful conclusion that impacts are acceptable.

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

In light of these considerations, it is evident that the scale of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. 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 understand that renewable energy should and can have a positive global impact, however, I wholeheartedly object to using land that is lived in, worked on and is culturally important as a dumping ground for 'Green' energy that has absolutely nothing to do with the people or the place that it's being enforced on. This is not for us. We do not want it. We are not built for - and nor do we need to be - mass structures or systems for anything. The islands never fully recovered from the capitalist mindset of the sheep farmers from the mainland who thought it a brilliant idea to use our land for their capital gains...otherwise known as the Clearances. This is the same idea, use land that is viewed as expendable, 'nothingness' for capital gain and not think of the rich environment, wildlife and way of life that this place has to offer, that will be ruined on every level if this goes ahead.

There are experts who can give statistics and facts on the marine and cultural impact of this project far more eloquently than me, but I can testify that no one here wants this. There is no need for wind farms of this scale to litter and disrupt our rich ecosystem, heritage and ways of living particularly when this has nothing to do with us.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 32826A1B

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment procedures. A thorough review of the Environmental Impact Assessment Report and accompanying materials reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise regarding the compatibility of the project's scale, proximity, and design with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. Essential environmental data is missing, baseline information is either limited or inconsistent, and crucial components of the proposal remain undefined. The adoption of a flexible design framework complicates the assessment of likely significant effects, and the reliance on unspecified mitigation measures hampers the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

There are evident and substantial conflicts with existing policies. The proposal is at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly pertain to the statutory tests required for consent and challenge the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines sited in close proximity to the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations highlight that the application is incomplete and unable to facilitate a lawful determination. In light of these factors, the precautionary principle must 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.

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.

TOURISM

The proposed development fails to adequately assess the impacts on tourism, which is a crucial part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it does not provide a detailed evaluation of how large-scale offshore infrastructure would influence visitor numbers, behaviour, or overall economic contribution.

Tourism on the island has seen significant growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the local economy. The application neglects to analyse how the industrialisation of the seascape and a decline in environmental quality would affect Tourism Gross Value Added or the economic resilience of the area. Without this analysis, it is impossible to determine if the development would provide a net economic benefit or harm this vital and growing sector.

Furthermore, the assessment overlooks the critical role that environmental quality plays in attracting tourists, particularly the significance of unspoiled landscapes and dark skies for visitor experiences. The absence of a Dark Skies Assessment adds to this shortcoming, leaving a considerable gap in understanding the effects on nature-based tourism and astro-tourism, which are emerging markets in the area.

In a community with limited economic diversity, not evaluating the impacts on tourism carries broader implications for employment, local businesses, and overall community sustainability. The lack of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show compliance with National Planning Framework 4, particularly regarding economic impact and the need to demonstrate net benefit. It conflicts with strategic goals that prioritise tourism as a growth sector and fails to provide sufficient evidence for a competent authority to evaluate the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency leads to a significant gap in evidence. This deficiency hampers a thorough evaluation of economic effects and suggests that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined in statutory duties, national policy, and evidential standards. It revisits the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data undermine the reliability of the application, which relies on an undefined design envelope and unspecified mitigation measures. Additionally, key impact pathways have been overlooked, including nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failures are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty under the Islands (Scotland) Act 2018. Furthermore, the incomplete disclosure of the Social Impact Assessment constitutes a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4, lacking evidence of biodiversity protection, natural places, and cultural heritage preservation. It also does not demonstrate that health and wellbeing impacts are acceptable or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and barring a lawful conclusion that the 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, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent effects that cannot be satisfactorily mitigated.

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder the capacity for a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

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: F7D8E93A

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which is currently under marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents, highlighting deficiencies in planning, environmental aspects, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area with a coastline facing the Atlantic, known for its near-pristine environment and strong cultural heritage.

Concerns arise due to the unprecedented scale of the proposal, which features large turbines placed close to the shoreline. This positioning raises significant issues related to landscape capacity, visual impact, and overall environmental effects. The application lacks a solid evidential foundation for lawful determination, missing critical environmental data, while baseline information is often inconsistent or insufficient. Many key aspects of the proposal remain unclear, and the flexible design framework obstructs a comprehensive understanding of potential significant effects. Furthermore, the proposal relies on unspecified mitigation measures, rendering it impossible to assess their effectiveness. As a result, the available documentation does not provide a thorough understanding of the environmental, cultural, or community impacts. Claims of negligible or non-significant effects lack strong evidential support.

Substantive policy conflicts exist, with the proposal appearing at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts are critical as they directly impact the statutory tests for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete. Given these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive, transparent, and dependable account of the probable environmental consequences of the proposed project. The report's reliance on a flexible Project

Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces significant uncertainty. This lack of clarity hampers the ability to consistently apply a worst-case scenario, undermining the assessment's integrity and resulting in the potential for the impacts described not to align with the development ultimately executed. This deficiency hampers both public understanding and that of the competent authority regarding the true extent of the environmental effects.

Moreover, the application leans heavily on unspecified mitigation measures, monitoring strategies, and management plans, which remain undeveloped at this stage. Seeking consent under these conditions means that environmental harm will ostensibly be addressed later, thereby obstructing any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally improper, contravening the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly defined prior to determination.

Additionally, significant evidential gaps are present, including inadequacies in baseline data and methodological limitations, alongside a reliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty incompatible with statutory obligations.

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, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it remains unproven that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is critically flawed and fails to provide a comprehensive or reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not adequately identify species presence, behaviour, and

habitat utilisation. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or evaluate their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential impacts of construction activities, noise, and increased human presence have not been thoroughly assessed. This oversight compromises any assertions regarding the absence of significant effects on this species.

Further issues arise in the evaluation of basking sharks, where reliance on aerial surveys introduces considerable detection bias, especially in Atlantic conditions. This approach is prone to underestimating the presence of these sharks, particularly when compared to established land-based observations that demonstrate frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline and undermines the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects being based on assumptions rather than on robust evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an inadequate identification and assessment of protected species. The uncertainty created by these deficiencies inhibits the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, the grant of consent cannot be justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided is fundamentally unreliable, riddled with internal inconsistencies and significant gaps in evidence. It does not adequately demonstrate that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not face adverse effects from the proposed development. This area is crucial for foraging and migratory pathways, yet the potential risks of displacement, collision, and habitat loss have not been sufficiently evaluated.

There is a notable contradiction in the application; while the developer asserts that there will be no significant adverse effects, they simultaneously present a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This raises serious doubts about the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided.

The assessment lacks adequate proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding areas is not thoroughly considered, and the reliance on modelling approaches adds further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate potential mortality, especially in the face of incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognized migratory corridor poses a significant risk, effectively creating a barrier for species travelling between the United Kingdom and Iceland. There is insufficient assessment of the long-term implications of sustained mortality within this corridor or the potential impacts on species with limited global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to confidently conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and undermines any lawful conclusion in favour of consent.

Moreover, these deficiencies reflect a failure to adhere to 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 directly in conflict with national policy.

Collectively, the assessment is deemed unreliable due to its internal contradictions, methodological flaws, and lack of sufficient evidence. These issues impede a thorough evaluation of impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity 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.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding its evaluation of marine life and fisheries, revealing a lack of robust assessment of both ecological and socio-economic impacts. The waters off the West Lewis coast host a vibrant marine ecosystem alongside an active fishing industry, yet there is no evidence provided to assure that these critical habitats and activities can be protected from substantial disruption.

A notable flaw is the assumption that fishing activities can be displaced without repercussions. The application fails to demonstrate the availability or accessibility of alternative fishing grounds that could handle any additional pressures resulting from displacement. This lack of evidence is critical as it opens the door to potential overfishing in other areas, posing economic risks for the local fishing fleet. The impacts on livelihoods and fisheries remain inadequately understood due to the absence of a clear, evidence-based evaluation.

Moreover, the proposal presents considerable risks to marine species, particularly from construction-related underwater noise. The anticipated high-energy hammer piling over a prolonged duration is likely to create disturbances that reach significant distances, adversely affecting species such as dolphins. The expected impact on a substantial portion of the local bottlenose dolphin population raises serious concerns; yet, the application minimises the significance of these effects, lacking adequate 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 those impacts as negligible. This contradiction raises alarming questions about compliance with the Habitats Regulations, especially where anticipated harm could necessitate legal authorisation.

The assessment inadequately considers cumulative impacts that arise 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 does not comply 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 mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal embodies sustainable development.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the standards for sustainable development. It does not satisfy statutory duties, national policy, or evidential standards. Similar issues were present in the rejected 2008 Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current application is under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are significant gaps in the information provided. The application relies on an undefined design envelope and on unspecified mitigation measures, which are critical oversights. Essential impact pathways have been omitted, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to present a full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

Environmental risks related to marine ecology, seabirds, protected species, and marine mammals remain uncertain and potentially significant. The assessments are incomplete and sometimes inconsistent. The evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, the competent authority should refuse consent or require the submission of the missing information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Additional Comments

A significant negative impact of offshore wind on our marine life, is underwater noise - both from the construction and operation of floating windfarms. In addition, research by Norwegian scientists shows that large scale wind farms can strongly influence

marine primary production as well as oxygen levels in and beyond the wind farm areas. (Helmholtz-Zentrum Hereon study, Hereon Institute of Coastal Systems researchers).

Offshore turbines can increase seabird mortality via blade collisions, with research showing that several at-risk species are at a particularly low level.

Reviews of UK marine decision-making show persistent evidence gaps and uncertainties around cumulative ecological effects. This is surely appropriate grounds to demand a precautionary approach.

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: 371C4CA0

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies related to planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposal raises serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Key components of the proposal remain unclear, and the flexible design framework employed hinders a proper assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures calls into question their effectiveness, rendering the documentation inadequate for a comprehensive understanding of the potential environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and substantial. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests essential for obtaining consent and impair the competent authority's ability to determine whether the development is policy-compliant.

The scale of the proposal is unprecedented for this location, as it includes large turbines positioned very close to the shoreline, which raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal is fundamentally flawed due to the deficiencies within the Environmental Impact Assessment Report, which lacks a complete, transparent, and reliable evaluation of its likely environmental effects. Central to this issue is the adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This uncertainty hampers a consistent application of a worst-case scenario, compromising the assessment's integrity and leaving both the public and the competent authority uninformed about the true extent of the environmental impacts that may arise from the development.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that potential environmental harm will be resolved later is unacceptable, as it undermines any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of critical information to post-consent stages contradicts the foundational principles of the Environmental Impact Assessment regime, which mandates that significant effects and appropriate mitigations must be established clearly before determination.

Additionally, the report exhibits significant evidential shortcomings, including gaps in baseline data, limitations in methodology, and a tendency to rely on assumptions rather than site-specific evidence. This results in ambiguity regarding the scale and significance of potential impacts, particularly when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential standard set by the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal fails to comply with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that suitable safeguards are in place.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation, and significant gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application lacks a proper assessment of alternatives, which is crucial for compliance with the Environmental Impact Assessment regime. Instead of delivering a clear and reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of the project's evolution. This method neglects to show

that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging solutions.

Furthermore, there is a distinct absence of transparent, evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the delicate nature of the West Lewis coastline and the critical role that proximity to shore plays in assessing impact, the lack of such analysis hinders any conclusion that the proposed siting is indeed the least harmful option.

Additionally, the issues extend to the evaluation of cable routing and landfall assessments. There is a lack of sufficient evidence showing that alternative routes have been adequately investigated to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to provide a clear avoidance strategy, combined with the absence of comparative analysis, signifies that mitigation through design has not been employed, relying instead on measures that would be implemented after design.

Consequently, the application does not demonstrate that environmental harm has been minimized through appropriate site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives exist. In the absence of a rigorous assessment of alternatives, it is impossible to assert that the proposal aligns with sustainable or policy-compliant solutions.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially in terms of safeguarding natural areas, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed, presenting an incomplete and unreliable picture of the ecological receptors in the West Lewis coastal environment. This marine system is biologically active and highly sensitive, yet the baseline data is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species. Consequently, the assessment falls short in providing a solid evidential basis for understanding potential impacts.

Among the most critical oversights is the failure to properly evaluate otters, which are a European Protected Species. The application neglects to acknowledge and assess their use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the assessment cannot accurately determine

the potential impacts of construction activities, noise, and increased human presence. This absence of analysis undermines the conclusions drawn regarding the significance of effects on this species.

The evaluation of basking sharks also suffers from serious deficiencies. Relying solely on aerial surveys introduces considerable bias in detection, particularly under Atlantic conditions, which may lead to an underestimation of their presence. In contrast, established land-based observations reveal a frequent use of these waters. The failure to incorporate such critical data results in an incomplete understanding of the baseline and diminishes the reliability of the conclusions.

These methodological flaws mean that the assertions of negligible or non-significant effects are largely based on assumptions instead of solid evidence. The lack of adequate baseline data further complicates the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true extent of risks to marine species and habitats.

Regulatory requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4 have not been met, as the application fails to identify or assess protected species properly. The resulting uncertainty makes it impossible to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent is not legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal contradictions that severely undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are currently in decline. However, the application does not adequately demonstrate that these species will not be adversely affected by the development. It is located within key foraging areas and migratory pathways, yet the assessment fails to robustly consider the implications of potential displacement, collision risks, and habitat loss.

A critical inconsistency arises in the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is necessary only if significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence provided.

The assessment lacks sufficient evidence to conclude that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the importance of these feeding grounds is not comprehensively addressed, and the reliance on modelling approaches introduces uncertainty, particularly regarding species facing severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in the context of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional and significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species with relatively small global populations. From a regulatory standpoint, the application fails to meet the evidential threshold necessary to ascertain no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which inhibits the ability to lawfully conclude in favour of consent.

Moreover, the deficiencies identified indicate a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal directly at odds with national policy. Collectively, these issues render the assessment unreliable, characterised by internal inconsistencies, methodological shortcomings, and inadequate evidence. These failures hinder a thorough evaluation of impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for a valid determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline, characterised by its expansive Atlantic horizon and an undeveloped nature, contributes to a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would introduce a continuous industrial presence that fundamentally alters this unique character, leading to an irreversible transformation of the landscape. The application fails to adequately convey the magnitude of this visual change. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, impacting visual amenity and diminishing the inherent qualities of naturalness and remoteness.

Concerns arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence suggests these viewpoints may not effectively represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which in turn undermines the assessment's reliability.

Moreover, the application does not consider the interconnectedness of landscape, seascape, and cultural heritage adequately. Significant 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. Treating these sites as isolated entities fails to recognise their interdependence, resulting in an incomplete assessment of impacts on their setting and cultural significance. The introduction of industrial elements to the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not merely a visual impact but also broader cultural and spatial harm that the application has not sufficiently assessed.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the protection of natural environments and historic assets. The extent of change proposed does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy.

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

In summary, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is incompatible with the preservation of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory 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

Given that we are facing a global climate crisis which demands we move away from fossil fuels, I support general adoption of renewable energy sources. In addition, it is important to diversify national energy provision so that we become less reliant on imported fuels which are at the mercy of international events.

However, taking all this into account, it is still the case that every planning application should be scrutinised for its locally-specific consequences. There are a number of points I wish to raise.

The size of the development has already been questioned by Nature Scotland who state

in their consultation representation: "We reiterate and highlight that any scale of turbine will introduce significant day and night time effects on sensitive coastal, landscape and visual receptors". They recommend a significant reduction in turbine size, numbers, footprint and layout. Given the beautiful unspoilt nature of the area in question, I agree with Nature Scotland.

Furthermore, in terms of the development's impact on wildlife, there are serious concerns. The National Trust for Scotland highlights that as regards birdlife St Kilda, Mingulay and Berneray have not been included in the Habitats Regulations Assessment (HRA); Nature Scotland finds that an 'arbitrary...inadequate' study buffer area has been drawn around the array and that the EIA Scoping report does not adequately address the impact on migratory birds; The Whale and Dolphin and Hebridean Whale and Dolphin Trust do not believe that sufficient attention has been paid to the impact upon sea mammals.

It is understood that there is significant over-capacity in wind-energy supply in Scotland, and that demand is largely centred further south in the UK; it seems that this development is in part a response. Thus, it is questionable how far it would actually contribute to Scotland's carbon emissions reduction.

In general, I believe in the idea of 'small is beautiful'; in this circumstance, much smaller scale wind farm development could be appropriate, directly to the benefit of the Outer Hebrides. I believe that much of our resource and energy demands could be reduced, if we gave thought to how far our GDP growth-based economies are damaging the planet and all the species we share it with.

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: 80866580

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regulations. Upon reviewing the Environmental Impact Assessment Report and associated documentation, significant deficiencies have been identified regarding material planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage. The scale, design, and proximity of the wind farm raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment represents a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. The methodologies applied do not provide a complete or reliable understanding of ecological receptors within this area, with baseline data being notably incomplete. This inadequacy hampers the assessment's ability to capture essential aspects of species presence, behaviour, and habitat use, leading to a lack of sound evidential basis for evaluating potential impacts.

A critical oversight in the application is the failure to adequately recognise and assess the active use of coastal areas by otters, which are classified as a European Protected Species. The assessment neglects to consider their core foraging range and behavioural patterns, meaning that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. Consequently, the validity of conclusions regarding the absence of significant effects on this species is undermined.

Furthermore, there are notable deficiencies in the assessment of basking sharks due to the heavy reliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of these animals, especially when compared to established land-based observations indicating their frequent use of these waters. The failure to incorporate or adequately consider such pertinent data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings lead to conclusions about negligible or non-significant effects being based on assumptions rather than substantial evidence. Additionally, the lack of sufficient baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This scenario creates uncertainty regarding the true level of risk posed to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. Such deficiencies preclude a rigorous evaluation of impacts on marine ecology and protected species, further substantiating the conclusion that the application is devoid of a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage along the West Lewis coastline is seriously lacking. It fails to recognise this area as a living cultural landscape, where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplistic view, treating heritage merely as a collection of isolated, unchanging assets, rather than understanding their dynamic social, cultural, and spiritual roles within the community.

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to assess environmental impacts, particularly concerning construction and pollution risks. There is a significant reliance on future mitigation and contingency measures that are to be developed after consent, which raises immediate concerns about the adequacy and effectiveness of such plans. This is especially troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to disturbance and contamination from sediment.

Risks associated with sediment mobilisation and accidental spills of chemicals or oil have been acknowledged in the application; however, there is insufficient information on how these risks will be managed, controlled, or monitored. Furthermore, there is considerable uncertainty regarding the nature and scale of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, it is impossible to ascertain the potential ecological effects, duration, or extent of these impacts. This uncertainty also applies to marine species and habitats that are already recognised as sensitive within the broader assessment.

The shortcomings are exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application undermines the ability to evaluate whether adequate measures are in place to address pollution events. This creates procedural risks and limits the competent authority's capacity to assess environmental protection effectively at the point of determination.

From a regulatory standpoint, this deferral of critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. It is essential that significant effects and mitigation measures be evaluated before consent is granted, and the lack of such information means that a lawful determination cannot be achieved. Additionally, the application fails to demonstrate compliance with essential policy requirements concerning environmental protection and water quality.

Overall, the lack of clearly defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal introduces substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across significant distances, with concerns specifically raised about the local bottlenose dolphin population. The application appears to downplay the severity of these effects, lacking sufficient supporting evidence to justify this minimisation.

Furthermore, the assessment of fisheries and marine life is inadequate and does not

offer a comprehensive evaluation of the ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to demonstrate how these uses and habitats can be protected or maintained without substantial disruption.

A critical issue lies in the assumption that fishing activity can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This lack of information is troubling, as it raises the risk of overfishing in other areas and may lead to wider economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods cannot be properly understood.

There is also a notable inconsistency within the application. While the need for licences to permit harm to European Protected Species is acknowledged, impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a level that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is crucial; otherwise, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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

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

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 echoes the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a central concern. The current application is submitted under a policy framework that ostensibly prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are critical gaps in the evidential basis required for decision-making, including incomplete baseline data and the use of an undefined design envelope. Additionally, there is an overreliance on unspecified mitigation measures, while key impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—have been overlooked. The Environmental Impact Assessment is therefore inadequate, failing to provide a full understanding of the potential significant effects or residual impacts.

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

Moreover, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, and cultural heritage; it fails to show that health and wellbeing impacts are acceptable; and it lacks evidence of a net economic benefit, due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring their 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 occasionally inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, alongside 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 invoke the necessary regulatory provisions to require the submission of the outstanding information.

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

Additional Comments

Will seriously impact the fishing industry in which I have a huge vested interest .. fishing is the ‘bread and butter ‘ of young families making a living in such very challenging times .. don’t make life anymore harder for them..^[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: C3140904

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents. It highlights significant deficiencies in planning, environmental assessments, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project in relation to statutory obligations, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful decision. Important environmental data is absent, baseline information is inadequate and inconsistent, and key details of the proposal remain unspecified. The flexible design framework employed complicates understanding of potential significant impacts, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or insignificant effects that lack robust backing.

There are evident and serious policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the development's acceptability within policy frameworks.

This development's scale is unprecedented for the area, with large turbines proposed near the shoreline, raising significant issues about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on vague mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and unfit for lawful consideration. Given these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the environmental effects of the

proposal. Central to these issues is the reliance on a flexible Project Design Envelope, which lacks firm commitments to specific turbine dimensions, layouts, or configurations. This introduces substantial uncertainty and obstructs the consistent application of a worst-case scenario. Consequently, the impacts disclosed may not accurately represent the final development, thereby hindering both public understanding and the competent authority's ability to comprehend the true extent of environmental effects.

Moreover, the application is heavily contingent upon yet-to-be-defined mitigation measures, monitoring strategies, and management plans. This approach seeks consent on the premise that any environmental harm will be addressed post-consent, which compromises the opportunity for meaningful evaluation of effectiveness and an assessment of residual impacts. Such deferral of crucial information to stages following consent contradicts the Environmental Impact Assessment regime's intention, which mandates that significant effects and mitigation strategies are established clearly prior to determination.

Further exacerbating the situation are notable evidential deficiencies, including incomplete baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of the impacts, especially where conclusions regarding negligible or non-significant effects are made without robust supporting evidence. The lack of sufficient information obstructs a comprehensive understanding of cumulative and worst-case impacts and introduces scientific uncertainty incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold stipulated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This scenario activates the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to adhere to the National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it does not demonstrate that impacts have been fully assessed or that appropriate safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species in the application is insufficient, leading to an incomplete understanding of ecological receptors in the West Lewis coastal area. This marine environment is known for its sensitivity and biological activity, yet the baseline data provided is inadequate, and the methods employed do

not sufficiently identify species presence, behaviour, or habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for determining potential impacts.

One critical area of concern is the failure to adequately assess otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge their active use of coastal regions for foraging and movement. This oversight neglects their core foraging range and behavioural characteristics, leading to an inadequate evaluation of the impacts arising from construction disturbances, noise, and heightened activity. Such omissions undermine any assertions about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys that may introduce significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks when compared to established land-based observations, which indicate their frequent usage of these waters. By failing to integrate or adequately consider this data, the assessment presents an incomplete baseline that diminishes the validity of its conclusions.

These methodological shortcomings result in the assessment's conclusions of negligible or non-significant effects being based more on assumptions than on substantiated evidence. The lack of adequate baseline data inhibits a thorough evaluation of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This uncertainty casts doubt on the true extent of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the standards set by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced by these deficiencies precludes a definitive conclusion regarding the absence of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, the granting of consent would not be legally justified.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and conclusions that lack support renders the assessment unreliable. These inadequacies hinder a comprehensive evaluation of impacts on marine ecology and protected species, affirming that the application does not possess a sufficient evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies that severely undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to meet the required evidential standard to demonstrate that these species will not

be adversely affected. The development's location within key foraging areas and migratory pathways is critical, yet the assessment does not adequately evaluate the implications of displacement, collision risk, or habitat loss.

There exists a fundamental 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 necessary only when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions lack support from the underlying evidence. Furthermore, the assessment does not provide sufficient proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is insufficiently considered, and reliance on modelling approaches introduces considerable uncertainty, particularly for species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality rates, particularly when baseline data is incomplete and behavioural responses are not fully understood.

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

From a regulatory standpoint, the application fails to satisfy the evidential threshold necessary to assert 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 achieved. This invokes the precautionary principle and undermines the legal basis for a conclusion in support 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. The inability to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings obstruct a robust 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 West Lewis coastline is fundamentally a living cultural landscape, where the environment, language, tradition, and community are closely intertwined. However, the assessment of cultural heritage and community identity in the application is fundamentally inadequate, as it treats heritage as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

A significant shortcoming of the assessment is its handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet the assessment categorises them as static features, neglecting their continued use, significance, and the potential impact of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their vital role in community life.

Moreover, the application fails to address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity, yet they are entirely omitted from the assessment, which constitutes a significant oversight. Without acknowledging these factors, it becomes impossible to fully understand the cultural impact of the proposed development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which has a distinct cultural identity that aligns with recognised characteristics of Indigenous Peoples, has not been engaged in a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and disregards established principles of participation in decisions affecting cultural and environmental interests.

A further procedural failing is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community. This oversight alone renders a lawful determination impossible.

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

In summary, the neglect to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a considerable 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 costs of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts on the seascape, landscape, and environment is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the receiving environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness, would undergo a fundamental transformation with the introduction of large-scale turbines in close proximity to the shoreline. Such developments would create a continuous industrial presence that would permanently alter the area's character.

Moreover, the application fails to accurately depict the scale of visual change. The turbines, due to their size and proximity, would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the key qualities of naturalness and remoteness, while the assessment does not effectively communicate the significance of these impacts within a sensitive landscape context.

There are also serious methodological issues regarding the choice and presentation of visual viewpoints. It appears that the selected viewpoints do not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, thus questioning the reliability of its findings.

Furthermore, the assessment does not adequately consider the interconnected relationship between the landscape, seascape, and cultural heritage. Key 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 erroneously treats these sites as isolated entities, neglecting their interdependence and leading to an incomplete understanding of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of the proposed changes is incompatible with the need to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any assertion of compliance with policy requirements.

It is evident that the impacts outlined cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is 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 efforts.

In summary, the assessment does not accurately reflect the scale of impact, the environment's sensitivity, or the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans is a significant flaw in the application, which relies heavily on undefined future measures. This deferral of critical environmental safeguards prevents an adequate evaluation of whether the necessary protections against pollution events are in place. Without robust emergency response procedures and contingency planning prepared prior to consent, there is a procedural risk that undermines the authority's ability to assess environmental protection measures effectively.

The sensitivity of the West Lewis coastline heightens concerns regarding the incomplete assessment of construction and pollution risks. This area is home to clean coastal waters and important habitats that could be adversely affected by sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for chemical or oil spills, it fails to provide sufficient detail on how these risks will be mitigated or monitored effectively.

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

From a regulatory standpoint, the failure to include detailed Construction Environmental Management Plans or Pollution Prevention Plans contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and necessary mitigations are assessed prior to the granting of consent. The application's deficiencies in demonstrating compliance with policy requirements related to environmental protection and water quality further illustrate its incomplete nature.

Taken collectively, the lack of clearly defined mitigation measures and uncertainty regarding potential impacts result in a materially deficient assessment. These shortcomings inhibit a thorough evaluation of construction and pollution risks and highlight the application's overall incompleteness.

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 application presents a range of significant risks and gaps that undermine its reliability and legality. The routing of infrastructure through active croft land raises concerns over potential conflicts with existing land use and legal rights. There is insufficient evidence provided to demonstrate that the necessary consents or processes have been initiated, which calls into question the deliverability and lawful implementation of the project.

The proposal also fails to adequately address the critical issue of carbon balance. Disturbances to peatland release stored carbon, leading to a carbon debt that could contradict the aims of renewable energy development. Without demonstrating that the overall carbon balance remains beneficial, the application lacks a crucial component necessary for a proper assessment.

Moreover, there are serious implications for sensitive habitats such as machair systems and peatland environments that are afforded policy protection. The application does not show that these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented, indicating a clear evidential gap regarding biodiversity protection.

The assessment of onshore infrastructure is fundamentally flawed and incomplete, failing to consider the interconnected nature of the offshore turbines and onshore works. This fragmented approach obscures the true scale of environmental and socio-economic effects that arise from what is a single integrated project. The onshore components, including cabling across protected moorland and the construction of a substation near Stornoway, involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts hinders a full understanding of the project's overall environmental footprint.

Additionally, the separation of offshore and onshore elements prevents the proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project are considered together. However, by treating them separately, the combined impacts on peatlands, habitats, and communities remain inadequately understood.

From a policy standpoint, the failure to evaluate the project as a whole and demonstrate protection for peatlands, habitats, and land use interests is in conflict with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the application's validity. Collectively, these factors render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment regarding dark skies and nocturnal wildlife is a significant gap in the Environmental Impact Assessment, which has serious implications for the proposal. The West Lewis coastline is known for its exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This is particularly troubling given the significance of dark skies to the identity of the region and the emergence of tourism sectors such as astro-tourism. The lack of consideration for these impacts indicates a clear deficiency in the overall landscape and environmental assessment.

More critically, there has been no evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that there has been no evaluation of how aviation lighting may affect these species or contribute to their mortality.

This lack of assessment is exacerbated by the use of daytime survey data in the ornithological evaluation, which fails to capture nocturnal activities or related risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, yet this risk has gone unassessed. The failure to provide site-specific night-time data creates a critical deficiency in understanding the ecological impacts.

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

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

In summary, the lack of any assessment related to dark skies and nocturnal wildlife presents a substantial evidential void. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of underpinning a lawful determination.

SUMMARY

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

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

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

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and barring a lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

I am deeply concerned about this proposed development off the West Coast of Lewis. Having been brought up there, and still being a frequent visitor, I believe this will have a hugely detrimental effect on the islands, which will never be reversed.

Wind farm construction is brutal on the environment, pouring tonnes of concrete for turbines which have a limited lifespan before they need decommissioned or replaced.

The stunning vistas onshore and offshore will be decimated for short term gain and profit of companies far removed from the islands and still there are no signs of how islanders will benefit in kind, with cheaper bills.

Employment will be given to mostly itinerant workers, or it will be short term jobs which remove workers from other positions with higher pay, but after construction is over, they will have no jobs to return to as small business will have failed.

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: 9ACB9FC0

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a detailed review of the Environmental Impact Assessment Report and associated documentation, revealing several critical deficiencies related to planning, environmental considerations, cultural heritage, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and significant cultural identity. The scope, design, and scale of the proposed development give rise to serious concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application is fundamentally flawed due to the absence of a robust evidential basis necessary for a lawful determination. Essential environmental data is lacking, while the baseline information provided is both limited and inconsistent, leaving key elements of the proposal undefined. The employment of a flexible design framework hampers a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures precludes any evaluation of their effectiveness. Consequently, the documentation does not furnish a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by adequate evidence.

Moreover, there exist clear and substantive conflicts with existing policies. The proposal shows inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These policy conflicts directly relate to the statutory tests required for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

In addition, the unprecedented scale of the proposal poses significant challenges, with large turbines located in close proximity to the shoreline, which raises profound concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential shortcomings, and pronounced non-compliance with policy clearly indicate that the application is incomplete and insufficient to support a lawful determination. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report associated with this proposal is fundamentally flawed, lacking a full, transparent, and dependable account of the anticipated environmental effects. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This situation hinders the ability to apply a worst-case scenario consistently, undermining the assessment's integrity. As a result, the impacts described may not accurately reflect the actual development that will be constructed, thus obscuring the true extent of environmental effects from both the public and the competent authority.

Additionally, the application places considerable emphasis on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Consent is sought on the premise that any environmental harm will be addressed later, obstructing any meaningful evaluation of the effectiveness of such measures or an 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 regime, which mandates that significant effects and mitigation measures must be clearly outlined prior to determination.

Moreover, there are substantial evidential deficiencies within the application, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are put forward without adequate supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory requirements.

Consequently, the application fails to meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including its stipulations related to biodiversity protection and environmental integrity, as it cannot be confirmed that impacts have been thoroughly assessed or that appropriate safeguards exist.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in its assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment

regime. Instead of offering a structured, reasoned comparison of feasible alternatives based on their environmental impacts, the submission provides a narrative detailing project evolution. This approach does not sufficiently demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a notable lack of a transparent, evidence-based comparison concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately considered the placement of turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact make this oversight particularly concerning. Consequently, without such analysis, it is impossible to conclude that the proposed siting is the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly examined to 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 absence of comparative analysis suggest that mitigation by design has not been adequately considered, leading to an over-reliance on post-design mitigation measures.

Due to these issues, the application does not demonstrate that environmental harm has been adequately minimised through site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy and prevents the competent authority from discerning whether more suitable, less harmful alternatives are available. The absence of a comprehensive alternatives assessment raises doubts about whether the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, especially regarding the protection of natural spaces, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been sufficiently evaluated and cannot lawfully support a determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks completeness and reliability, failing to provide a thorough understanding of ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, but the baseline data is insufficient, and the methodologies used do not adequately capture species presence, behaviour, and habitat utilisation. Consequently, the assessment does not offer a strong evidential basis for evaluating potential impacts.

In particular, the application overlooks otters, a European Protected Species. It does not appropriately acknowledge or assess their usage of coastal regions for foraging and

movement. The failure to consider their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential effects of construction disturbance, noise, and increased activity. This gap undermines any conclusions regarding the lack of significant effects on this species.

Moreover, the assessment of basking sharks is inadequate, relying heavily on aerial surveys that introduce a significant detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that show frequent utilisation of these waters. The failure to include or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings indicate that conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This raises uncertainties about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime or National Planning Framework 4, as it fails to adequately identify or assess protected species. The uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Given these circumstances, granting consent is not lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment regarding the ornithological impacts of the proposed development is fundamentally flawed, with major gaps in evidence and notable inconsistencies that compromise its overall findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing declines. However, the application does not adequately demonstrate that these species will remain unaffected, falling short of the necessary evidential standards. Key foraging areas and migratory pathways are directly impacted by the proposed siting of turbines, yet the assessment fails to comprehensively evaluate the risks associated with displacement, collision, or habitat loss.

There is a significant contradiction within the application itself, as the developer claims no substantial adverse effects will occur while simultaneously making a case for derogation under the Habitats Regulations, which is typically warranted only when significant harm is anticipated. This inconsistency raises doubts about the reliability of

the assessment, indicating that its conclusions lack support from the evidence it presents. The assessment does not adequately confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the dependence on modelling techniques introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. Furthermore, the methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and limited understanding of the species' behavioural responses.

The location of the turbines within an established migratory corridor poses an additional and significant risk, as it effectively obstructs a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment does not sufficiently examine the long-term consequences of potential ongoing mortality within this corridor, nor does it address the impacts on species with comparatively small global populations.

From a regulatory standpoint, the application does not fulfill the evidential requirements to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling constraints, indicates that the standard of proving beyond reasonable scientific doubt has not been met. This activates the precautionary principle, hindering a lawful decision in favour of consent. The identified deficiencies also represent non-compliance with the National Planning Framework 4 concerning the protection of biodiversity and natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely impacted places this proposal in direct opposition to national policy.

Collectively, these factors render the assessment unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. Such shortcomings hinder a thorough evaluation of potential impacts and support the overall conclusion that the application fails to meet the necessary statutory criteria for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal fails to adequately assess community rights and engagement, particularly concerning the Gaelic-speaking population, which embodies the characteristics of an Indigenous People. The absence of a Free, Prior and Informed Consent process significantly undermines the legitimacy of the assessment, ignoring established principles of participation essential for decisions impacting cultural and environmental interests.

Moreover, there is a critical procedural oversight in the lack of a compliant Island Communities Impact Assessment, a statutory requirement as stipulated by the Islands (Scotland) Act 2018. This deficiency hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic implications for the island community, thereby preventing a lawful determination of the proposal.

The cultural heritage assessment is fundamentally flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape where community, language, tradition, and environment are closely interlinked. Rather than acknowledging the ongoing social, cultural, and spiritual functions of heritage, the application adopts a reductive perspective, treating cultural assets as isolated and static entities.

Additionally, the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, is inadequate. These sites serve as active places for burial and spiritual practices but are mischaracterised as static features in the assessment. This oversight neglects their continued use and meaning, resulting in an incomplete evaluation of cultural impacts and disregarding their significance in community life.

Intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's historical relationship with the coastal environment, is also overlooked. These elements are integral to the identity of the area but are entirely absent from the assessment, creating a significant gap in understanding the cultural impact of the development.

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

Collectively, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the development remain inadequately addressed, and the application does not furnish a sound basis for evaluating the actual cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not had its full report published, creating a significant evidential gap. This deficiency hinders both public understanding and the competent authority's ability to evaluate the full extent of social risks identified through the developer's research. Available summaries suggest that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These reported impacts stem from direct engagement with the community, affirming their validity rather than being speculative in nature. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the determination of their significance in the decision-making process.

Moreover, there is evidence to suggest that the proposal threatens community identity

and cohesion, with the developer's own findings highlighting "cultural loss." Despite this acknowledgement, these impacts have not been adequately integrated into the main application or assigned appropriate weight. The decision to withhold the full Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency fundamentally undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character may be jeopardised.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for developments to support positive health outcomes and mitigate harm, yet the available evidence points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, the application cannot show compliance with this policy.

The procedural ramifications are considerable, as the competent authority cannot conduct a rigorous socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a material omission in the application and signifies a failure to meet the evidential standards required under the Environmental Impact Assessment regime. Collectively, the failure to disclose the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment both incomplete and unreliable, preventing a lawful determination and reinforcing the conclusion that the application is unsupported by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

assessment's reliability.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises serious concerns due to the incomplete assessment of construction and pollution risks, which lacks the necessary detail to properly evaluate the likely environmental effects. The project plans include significant seabed preparation and installation works in a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application suggests that mitigation and contingency measures will be developed after consent is granted, hindering any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined measures is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and

accidental spills of chemicals or oil, it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is considerable uncertainty about the scale and behaviour of sediment plumes that could result from seabed disturbance and cable installation. Without thorough 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 sensitive marine species and habitats identified in 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 adequate safeguards are established to respond to pollution incidents. This approach introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be evaluated before consent is granted, and when such information is absent, a lawful determination cannot occur. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts all contribute to a materially deficient assessment. These significant shortcomings prevent 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. However, the application under consideration lacks a thorough assessment of fisheries and marine life, failing to provide a solid evaluation of both ecological and socio-economic impacts. It does not sufficiently demonstrate how these important habitats and activities will be protected or maintained without significant disruption.

A critical concern is the assumption made within the application that fishing activity can be displaced without any adverse consequences. There is no evidence provided to suggest that alternative fishing grounds exist, are accessible, or can handle the additional pressure that would result from such displacement. This significant omission raises concerns about the potential for overfishing in other areas, which could lead to broader economic repercussions for the local fishing fleet. Without a clear and evidence-backed assessment, understanding the impacts on fisheries and local livelihoods remains impossible.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The high-energy hammer piling anticipated to occur over an extended period is expected to cause disturbances across considerable distances, affecting species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application tends to minimize the importance of these effects without providing adequate evidence.

There are also inconsistencies within the application itself. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously describes the expected impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when potential harm is significant enough to necessitate legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore infrastructure works, including cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These elements are assessed separately from the offshore turbines, which leads to a fragmented evaluation and obscures the true scale of the project's environmental and socio-economic impacts. The excavation across deep peat areas, particularly within Barvas Moor, threatens a critical carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, which inhibits a complete understanding of the project's overall environmental footprint.

By neglecting to adequately assess the onshore impacts, the application does not allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together. However, the

separation of onshore and offshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application does not demonstrate that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures have been taken. This results in a clear evidential gap regarding biodiversity protection.

The proposal raises critical concerns about carbon balance. Disturbing peatland can release stored carbon, potentially generating a carbon debt that undermines the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, which raises serious questions about the deliverability and lawful implementation of the project.

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

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 application incomplete and unreliable, ultimately obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife stands out as a critical shortfall in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to consider how this lighting will impact visual amenity, landscape character, and the overall experience of both residents and visitors. This oversight is particularly concerning given the significance of dark skies for the region's identity and the emerging tourism sector focused on astro-tourism. As a result, the assessment presents a stark gap in the overall evaluation of the landscape and environmental effects.

The lack of evaluation extends to nocturnal wildlife, with no assessment provided for

species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to artificial lighting. This failure to address the potential risks, including disorientation and increased mortality due to collision, is troubling. Furthermore, the ornithological assessment's dependence on daytime survey data fails to account for nocturnal activities and the associated dangers. Species like Kittiwakes, which may forage or migrate at night, remain vulnerable to disorientation from artificial lighting, yet this risk has gone unexamined. The absence of site-specific night-time data leaves a critical void in understanding the ecological implications.

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

From a policy standpoint, these omissions clash with National Planning Framework 4, particularly concerning the safeguarding of natural areas and the quality of the environment. Additionally, this neglect undermines the broader analysis of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecosystem.

Collectively, the absence of any evaluation related to dark skies and nocturnal wildlife signifies a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit for supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is a significant failure in meeting the requirements of sustainable development as measured against statutory duties, national policy, and evidential standards. It echoes the critical concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. This current application is presented under a more robust policy framework, one that places an increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A thorough examination reveals that the application lacks a complete and dependable evidential basis for determination. There are essential gaps in the baseline data, the design envelope remains undefined, and there is an overreliance on unspecified mitigation measures. Furthermore, it fails to address crucial impact pathways, including those affecting nocturnal wildlife, the entirety of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is insufficient, hindering a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The absence of a compliant Island Communities Impact Assessment constitutes a violation of statutory duties under the

Islands (Scotland) Act 2018, and the lack of a complete Social Impact Assessment is a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inadequate for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural environments, or cultural heritage. The proposal fails to validate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as there has been no tourism impact modelling. The cumulative impact of both offshore and onshore components has not been adequately assessed, obscuring the potential effects on peatlands, carbon balance, habitats, and crofting land.

There are significant uncertainties regarding environmental risks, with the assessments of marine ecology, seabirds, protected species, and marine mammals being incomplete and occasionally inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thus engaging the precautionary principle and preventing any lawful conclusion that the impacts are acceptable.

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

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

For these reasons, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Additional Comments

I do believe that all of this will be detrimental to Islanders, marine life and bird life. The amount of materials to be used and likely disruption is horrendous. The building of this will damage so much more, the peat moors, seabed, wildlife and Islanders lifestyle. If I have got it right, all this electricity is being exported to England. And will have to be turned off at times, not saving but wasting 40-60% so why build it.

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: 067359B5

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 marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is sited off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, relatively unspoilt environment, and rich cultural heritage. The size, proximity, and design of the proposed wind farm raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. There are gaps in critical environmental data, and baseline information is both limited and inconsistent. Furthermore, vital components of the proposal remain unclear. The flexible design framework used obscures the understanding of potential significant effects, while the proposed mitigation measures, which have yet to be clearly defined, render an assessment of their effectiveness impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the claims regarding negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are apparent and substantial. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not show that it can meet national obligations to protect biodiversity, climate interests, and environmental integrity. Such discrepancies are directly related to the statutory tests for consent and compromise the competent authority's capacity to deem the development acceptable from a policy standpoint.

The scale of the wind farm is unprecedented in this area, with large turbines situated close to the shoreline, raising critical concerns about landscape capacity, visual dominance, and environmental effects. The combination of insufficient information, reliance on vague mitigation strategies, evidential shortcomings, and clear breaches of policy demonstrates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive and transparent evaluation of the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, lacking commitment to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty obstructs the effective application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that is ultimately realised, leading to a situation where both the public and the competent authority are left unaware of the true extent of the environmental effects.

A concerning aspect of the application is its heavy dependence on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought with the assumption that environmental harm will be managed later, which severely limits any thorough evaluation of the measures' effectiveness and assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated before any decision is made.

Moreover, there are considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an over-reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without strong supporting data. The lack of adequate information hinders a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that fails to meet statutory requirements.

As a result of these deficiencies, the application does not satisfy the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be evidenced that impacts have been thoroughly assessed or that appropriate safeguards are in place.

Overall, the reliance on an ill-defined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a thorough or dependable understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data is incomplete. The methodologies employed do not sufficiently capture species presence, behaviour, and habitat use, resulting in a lack of a solid evidential foundation for evaluating impacts.

A significant shortfall in the assessment concerns otters, which are a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. Consequently, the lack of evaluation regarding their core foraging range and behavioural patterns means that the potential effects of construction disturbance, noise, and increased activity have not been thoroughly assessed. This gap undermines any conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to the reliance on aerial surveys, which introduce considerable detection bias, especially in Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that indicate frequent usage of these waters. The failure to properly incorporate or consider such data results in an incomplete baseline, diminishing the reliability of the conclusions reached.

These methodological flaws lead to assertions of negligible or non-significant effects based on assumptions rather than solid evidence. The lack of sufficient baseline data also hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty clouds the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. Instead of appreciating heritage as an evolving entity with ongoing social, cultural, and spiritual significance, the application adopts a simplistic view that treats it as a collection of

isolated, static assets.

There is a critical shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These sites are active areas for burial and spiritual observance, yet the assessment overlooks their current use, meaning, and the potential impacts of development on their environment. This misrepresentation leads to an incomplete understanding of cultural implications, neglecting their integral role in community life.

Moreover, the assessment fails to address intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing relationship the community has with the coastal environment. These components are essential to the area's identity but are conspicuously absent from the evaluation, resulting in a significant gap. Without acknowledging these factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population embodies a unique cultural identity characteristic of Indigenous Peoples; however, there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's validity and disregards established principles of community involvement in matters affecting cultural and environmental interests.

Compounding these issues is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without such an assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is a significant barrier to lawful decision-making.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly diverges from established policy requirements.

Ultimately, the absence of a thorough evaluation of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential void. The cultural ramifications of the proposed development have not been adequately assessed, and the application fails to deliver a solid foundation for understanding the genuine cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment presented within the application fails to adequately capture the scale of change and the sensitivity of the West Lewis environment. The coastline is characterised by its open Atlantic horizon, undeveloped landscape, and a pronounced sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would result in a significant industrial presence, leading to a permanent and

irreversible alteration of this distinctive character.

Furthermore, the evaluation lacks an accurate representation of the visual impact anticipated from the turbines. Their scale and proximity would dominate views from residential zones, historic sites, and popular coastal areas, thereby negatively affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently articulate the significance of this impact within the context of such a sensitive landscape.

There are also critical methodological shortcomings in the selection and depiction of visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This oversight raises concerns that the visual impact may have been understated, thereby compromising the assessment's overall reliability.

Another notable deficiency is the lack of evaluation regarding the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and various Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their settings and cultural significance.

The proposed industrialisation of the seascape would disrupt these connections, altering how heritage assets are perceived and their link to the natural horizon. This goes beyond merely a visual impact, constituting a broader cultural and spatial detriment that has not been properly considered in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which emphasises the protection of natural landscapes and historic assets. The extent of the proposed changes is inconsistent with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further detracts from any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Thus, the resulting changes would be fundamental and permanent, not amenable to acceptable levels of reduction through mitigation measures.

In summary, the assessment does not accurately reflect the magnitude of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These significant deficiencies hinder a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the safeguarding of this landscape.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards required for sustainable development when evaluated against statutory responsibilities, national policies, and evidence-based criteria. This application echoes the primary concerns that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Currently, this proposal is presented under a strengthened policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A significant issue with the application is its lack of a comprehensive and reliable evidential foundation for assessment. It exhibits critical gaps in baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Moreover, it omits important impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of potential significant effects or residual impacts.

There are evident procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment is a breach of the statutory duty outlined in the Islands (Scotland) Act 2018. Additionally, the nondisclosure of the complete 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, thereby rendering the application unsuitable for determination.

Furthermore, the proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. The application also 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 effects of both offshore and onshore components have not been thoroughly assessed, leading to an obscured understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially severe. The assessments pertaining to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in certain areas. The evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination that impacts are acceptable.

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

Overall, the application is fundamentally unfit for determination, both procedurally and substantively. The extensive information gaps, combined with policy inconsistencies and unresolved environmental risks, obstruct any lawful and evidence-based decision.

The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory measures to necessitate the submission of the missing information.

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

Additional Comments

I believe the windfarm development will negatively impact the following areas:

Environmental & Biodiversity Loss: i am concerned regarding the disruption of the Lewis Peatlands Special Protection Area.

Visual & Coastal Impact: Proposed 300m+ turbines are so tall that they risk ruining unspoiled coastal views and the "unique charm" of the island.

Cultural & Tourism Threats: Projects risk harming the island's tourism economy, which relies on wild landscapes.

Infrastructure Stress: Potential for traffic congestion and danger on single-track roads

As a resident who lives and works on the island year round i believe this will have a profound negative impact on my home x

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: C5ECCDA4

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 basis for this objection stems from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The location of the proposed development off the west side of the Isle of Lewis is notable for its Atlantic-facing coastline and near-pristine environment, as well as its strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which raises questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical issue with the application is the lack of adequate evidential support for a lawful determination. Missing environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a clear understanding of the likely significant effects. The flexible design framework employed does not provide clarity, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to enable a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Moreover, there are substantial conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests required for consent, undermining the competent authority's ability to assess the development as acceptable in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and reliability to accurately represent the potential environmental effects of the proposed development. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This ambiguity compromises the assessment's integrity and means that the impacts detailed may not correspond to the final development, hindering both public understanding and the competent authority's ability to assess the true extent of environmental consequences.

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 promise of addressing environmental harm later makes it impossible to evaluate the effectiveness of these measures or the residual impacts meaningfully. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation strategies must be clearly established before any determination.

Evidential deficiencies are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues result in uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not meet the evidential threshold established by the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly with respect to protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, which includes mandates 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 an undefined design envelope, lack of specified mitigation, and gaps in baseline data leads to an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings hinder a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed determination based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is characterised as a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of the ecological receptors present. The methodologies employed do

not adequately capture species presence, behaviour, or habitat use, leading to an incomplete baseline data set that undermines the evidential basis for evaluating impacts.

One notable shortcoming is the failure to properly assess otters, a European Protected Species. The application neglects to recognise their active use of coastal areas for foraging and movement. Consequently, the assessment does not address their core foraging range or behavioural patterns, resulting in an insufficient evaluation of potential effects from construction disturbance, noise, and increased activity. This lack of consideration undermines any claims regarding the absence of significant effects on this species.

Additionally, there are critical deficiencies 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. Established land-based observations indicate frequent usage of these waters, yet such data has not been adequately incorporated or considered. The methodological limitations inherent in the assessment mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the absence of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty around the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these circumstances, granting consent would not be lawful.

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

There exists a contradiction in the application, as the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment lacks sufficient proof that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. It inadequately accounts for the significance of these feeding grounds, relying on modelling methods that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are connected. It adopts a reductive approach by treating heritage as isolated, static assets rather than acknowledging their social, cultural, and spiritual roles within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active places for burial and spiritual practice. However, the assessment categorises them as static features, overlooking their continued use and meaning. This mischaracterisation results in an incomplete evaluation of cultural effects and ignores their significance within community life.

Additionally, the assessment does not consider intangible cultural heritage, including the Gaelic language, traditions, and the relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the assessment. As a result, the cultural impact of the development remains poorly understood.

There are also concerns about community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of an Indigenous People. However, no process of Free, Prior and Informed Consent has been conducted. This lack of meaningful engagement undermines the assessment's legitimacy and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy perspective, these issues place the proposal in conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as living cultural practices, represents a clear departure from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application fails to provide a sufficient basis 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, remains unpublished in its entirety. This lack of transparency signifies a considerable evidential gap, impeding both public and competent authority understanding of the social risks identified through the developer's own investigation.

Available summaries reveal that residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore factual rather than speculative. However, the withholding of the complete assessment limits proper scrutiny of the findings and restricts the ability to evaluate their significance within the decision-making framework.

Moreover, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's

findings. Yet, these social impacts have not been adequately incorporated into the main application or given the necessary weight. The lack of access to the full Social Impact Assessment obscures the true human and social cost associated with the development.

This absence of transparency fundamentally undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health implications is crucial for developments of this magnitude, especially when community character and functionality may be compromised. The failure to provide the complete dataset means that the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

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

The procedural consequences are considerable. The competent authority cannot perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and indicates a failure to fulfil the evidential requirements outlined in the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse effects, renders the assessment insufficient and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks adequate information to support it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a dominant industrial presence that fundamentally alters this character. This change would result in a permanent and irreversible transformation of the landscape.

The assessment of visual impacts is significantly lacking, failing to adequately capture the magnitude of visual change anticipated. The scale and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the qualities of naturalness and remoteness. This crucial aspect of the assessment is not sufficiently articulated, nor is its importance in the context of the sensitive landscape acknowledged.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence indicates that these viewpoints may not adequately

encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been understated, thus compromising the reliability of the overall assessment.

Another significant gap is the failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, sharing visual and spatial relationships with the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This disruption represents not only a visual impact but also a more extensive cultural and spatial harm that has not been adequately addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The degree of change proposed is inconsistent with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the identified impacts cannot be effectively mitigated. The size, height, and proximity of the turbines would ensure their presence is dominant and inescapable. Consequently, the resulting change is not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, these deficiencies in the assessment lead to an inaccurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. Such shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment presented in this application is materially deficient, lacking the necessary detail to evaluate construction and pollution risks effectively. Significant seabed preparation and installation works are proposed within a high-energy Atlantic environment, yet fully developed Construction Environmental Management Plans and Pollution Prevention Plans are notably absent. Instead, the application places reliance on mitigation and contingency measures that are to be formulated after consent, obstructing any meaningful assessment of their potential adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming, considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination

from sediment. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the strategies for preventing, controlling, or monitoring these risks.

Furthermore, uncertainty surrounds 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 extends to potential effects on marine species and habitats that are recognised as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether appropriate safeguards are established to address potential pollution events. This introduces procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation need to be evaluated prior to granting 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 combination of undefined mitigation measures, the lack of detailed management plans, and uncertainty regarding potential impacts underscores the conclusion that the assessment is inadequate, ultimately preventing a thorough evaluation of construction and pollution risks.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry, yet the application does not adequately evaluate the ecological or socio-economic impacts of the proposed development. A significant concern is the assumption that fishing activities can be displaced without any negative consequences. The lack of evidence regarding the availability and accessibility of alternative fishing grounds, which could support increased pressure, is alarming. This gap could lead to overfishing in other areas and negatively affect the local fishing fleet's economic stability. Without a thorough, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to the underwater noise from construction activities. The anticipated high-energy hammer piling over an extended period is expected to disturb marine life over vast distances, with species like dolphins particularly affected. The predicted disturbance to a significant portion of the local bottlenose dolphin population is troubling, yet the

application minimizes these effects without adequate supporting data.

Moreover, the application exhibits contradictions by acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This inconsistency calls into question the reliability of the assessment and raises issues regarding compliance with the Habitats Regulations, especially since harm appears to be anticipated to a level that would require legal authorisation.

The assessment further neglects to consider the cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to understand the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, thus hindering the conclusion that this proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves onshore infrastructure works associated with offshore turbines, yet the assessment of these onshore elements is fundamentally inadequate. The onshore components are interconnected with the offshore project, but their separate evaluations lead to a disjointed understanding of the overall environmental and socio-economic ramifications. This lack of a cohesive assessment obscures the full extent of the impacts stemming from what is essentially a singular project.

The onshore works entail cabling across protected moorland, construction of a substation near Stornoway, and the establishment of access infrastructure in sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly in Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to offer a thorough evaluation of these impacts, thus hindering a complete understanding of the project's environmental footprint.

By deferring the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in conjunction, but the compartmentalisation of offshore and onshore components means that the combined effects on peatlands, habitats, and local communities are not fully appreciated.

Moreover, the application poses substantial risks to sensitive habitats such as machair systems and peatland environments, which are safeguarded by policy. There is no demonstration that the impacts on these habitats have been comprehensively evaluated or that suitable avoidance measures have been enacted. This creates a significant evidential gap concerning biodiversity protection.

Concerns about carbon balance are also raised by this proposal. Disturbance of peatland can release stored carbon, possibly resulting in a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance is favourable.

The routing of the infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which questions the feasibility and lawful execution of the proposal.

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

In summary, the disconnection between 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 untrustworthy, impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area’s identity and to emerging tourism sectors, such as astro-tourism, this omission is significant and results in a clear gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to assess how aviation lighting may affect these species or potentially increase mortality rates.

The reliance on daytime survey data in the ornithological assessment does not adequately capture nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the risk remains unassessed. The absence of site-specific night-time data presents a critical gap in understanding ecological impacts.

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

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

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, with growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not adequately assess how the proposed large-scale offshore infrastructure could affect tourism, particularly regarding visitor numbers and behaviours, which are heavily influenced by the area's natural attributes such as its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the absence of a detailed analysis leaves significant gaps in understanding the potential economic consequences of the development.

The failure to evaluate how the industrialisation of the seascape might impact Tourism Gross Value Added and the broader economic resilience of the island is concerning. Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or risk undermining a vital and expanding sector. Additionally, the assessment overlooks the critical role that environmental quality plays in supporting tourism, particularly concerning unspoiled landscapes and dark skies, which are essential for both visitor experiences and niche markets like nature-based tourism and astro-tourism.

Moreover, the lack of a Dark Skies Assessment exacerbates this issue, creating a significant oversight regarding a growing segment of the local economy. For an island

community that relies heavily on tourism and has limited economic diversification, the failure to evaluate the impacts on this sector poses broader implications for local employment, businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment further indicates that these economic vulnerabilities have not been addressed as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning the economic impacts and the necessity of showing net benefits. It also contradicts strategic goals that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to accurately assess the economic implications of the proposal. Collectively, the failure to quantify tourism impacts, evaluate the environmental drivers influencing visitor behaviour, and consider the island's economic dependency leads to a substantial evidential gap, hindering a thorough evaluation of potential economic effects and reinforcing the notion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates significant shortcomings in meeting the criteria for sustainable development as outlined by statutory obligations, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. This current application, however, is put forth under a supposedly stronger policy framework that places additional emphasis on biodiversity, peatland conservation, landscape integrity, and community wellbeing.

There exists a lack of a complete and reliable evidential basis for decision-making. Gaps in baseline data persist, and there is reliance on an undefined design envelope alongside unspecified mitigation measures. Furthermore, there are notable omissions regarding key impact pathways, specifically concerning nocturnal wildlife, comprehensive onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

Procedural inadequacies are also evident. The failure to produce a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment constitutes a material omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Conflicts arise with National Planning Framework 4, as the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It also fails to demonstrate acceptable health and wellbeing impacts and lacks evidence of net economic benefit due to the absence of tourism impact modelling. Furthermore, the

cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent internally. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful determination of acceptable impacts.

The proposal poses a risk of substantial and irreversible alteration to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and detrimental effects on tourism lead to permanent impacts that cannot be sufficiently mitigated.

In summary, the application is fundamentally flawed both procedurally and substantively. The magnitude of information deficiencies, along with conflicts with policy and unresolved environmental risks, obstructs a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent based on these grounds or invoke the appropriate regulatory provisions to require the submission of the missing information.

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

Additional Comments

I find the idea of the proposal abhorrent for so many reasons. Something of such a large industrial size on the Outer Hebrides should never been considered. The impact this will have is irreversible and will affect the Islands forever.

The impact on the seaside such as marine mammals is unforgivable. What right do we have to build 66 massive constructions in the path for these majestic creatures just because someone will make money. 66 massive structures so close to the shore on the West side will be awful for the people living there myself included. Non stop light, no dark skies and what financial benefit for the community. None whatsoever. Cheaper electricity nope. Help for those struggling with the cost of living, nope. Long term benefits, nope. Whoever signed this off should be ashamed. We know its just a money nest for a company who doesn't even live in Scotland.

One of the benefits of living on the Outer Hebrides is the peaceful, generally isolated locations to walk, reflect and improve wellbeing

. That will now be disrupted forever and during the process, should it go ahead the roads and infrastructure will effect everyone who lives here. Travelling to and from work across the Moor will be horrendous. How the community will support the number of people due to come up and temporarily live here is concerning. We have limited infrastructure as it is. GP surgeries where you are lucky to get an appointment in a week, sadly the highest rate of holiday homes not great for the families and young people who can't get property will now be heightened and not to forget where will these

people live and how will they integrate. There is also the impact on Gaelic culture to consider. The language and culture is under threat already but an influx of thousands will only add to this. I can honestly see no benefits for the people who live here and any financial gain will be heading to Canada. Why the councillors thought this was a good idea is beyond me unless it lined their own pockets.

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: 6FB3B80D

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies related to planning, environmental impacts, cultural heritage, and procedural integrity.

The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The scale and design of the project, particularly the placement of large turbines in close proximity to the shoreline, raise serious concerns about landscape capacity, visual impact, and overall environmental consequences.

Fundamental flaws are evident in the application, as it lacks an adequate evidential foundation necessary for a lawful determination. There is a noticeable absence of critical environmental data, with limited and inconsistent baseline information, while key elements of the project remain undefined. The flexible design framework utilised impedes a clear assessment of the likely significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a thorough understanding of potential environmental, cultural, and community impacts, rendering claims of negligible effects unsubstantiated by robust evidence.

Moreover, the proposal presents clear and substantial conflicts with established policies. It appears inconsistent with 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 adequately demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. These policy conflicts directly impact the statutory tests for consent and undermine the competent authority's capacity to deem the development acceptable from a policy standpoint.

In light of the unprecedented scale of this proposal in its specific location and the various evidential weaknesses present, it is clear that the application is incomplete and unable to support a lawful determination. Therefore, the precautionary principle must be applied in this context.

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 evaluation of community identity and cultural heritage in the application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, traditions, and community are deeply intertwined. The approach taken is overly simplistic, viewing heritage merely as a collection of static assets rather than appreciating their dynamic social, cultural, and spiritual significance within the community.

A significant shortcoming is the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, they are characterised merely as static features in the assessment. This oversight fails to acknowledge their ongoing significance and the implications of development on their surroundings, leading to an incomplete analysis of cultural effects and disregarding their importance in the fabric of community life.

Moreover, the assessment neglects to consider intangible cultural heritage, such as the Gaelic language and local traditions, along with the enduring connection between the community and the coastal environment. These aspects are vital to the region's identity but are entirely omitted from the analysis, representing a substantial gap. The absence of these considerations means that the cultural implications of the development cannot be fully comprehended.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population embodies a unique cultural identity with traits recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior, and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of community participation in decisions that affect their cultural and environmental concerns.

Additionally, there is a critical procedural oversight due to the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligations to assess the social, cultural, and economic impacts on the island community. This alone hinders a lawful determination of the application.

From a policy standpoint, these shortcomings contradict the requirements set forth in National Planning Framework 4, especially regarding the preservation of historical assets and places. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear divergence from necessary policy expectations.

In summary, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities has resulted in a significant evidential gap. The cultural consequences of the proposed development have not been adequately evaluated, and the application falls short in providing a robust basis for understanding the true cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment is a critical issue that undermines the entire evaluation process. The competent authority is unable to conduct a thorough socio-economic and health assessment without access to this essential document, resulting in a significant material omission within the application. This lack of transparency not only contravenes the evidential requirements of the Environmental Impact Assessment regime but also hinders the ability to determine the true human and social costs associated with the proposed development.

Available summaries reveal that local residents are already grappling with measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community, underscoring their significance. However, without the full assessment being made available for scrutiny, it is impossible to fully grasp the implications of these findings within the decision-making framework.

Moreover, evidence indicates that the development is seen as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own findings. Yet, these critical impacts have not been adequately integrated into the main application or given the weight they deserve. The withholding of the complete Social Impact Assessment thus obscures a comprehensive understanding of the social risks involved.

From a policy standpoint, the application fails to align with National Planning Framework 4 concerning health and wellbeing. The development must not only support positive health outcomes but also avoid causing harm. However, the evidence currently available points to existing adverse effects that remain undisclosed. This lack of clarity prevents any demonstration of compliance with the relevant policy.

The overall assessment of social impacts, health, and wellbeing is materially deficient and lacks the required transparency for a lawful evaluation. Consequently, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable assessment, ultimately preventing a lawful determination and reinforcing the assertion that the application lacks sufficient information.

CONSTRUCTION AND POLLUTION RISKS

The application for the proposed construction raises significant concerns due to its incomplete assessment of construction and pollution risks. Substantial seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be devised after consent, which hinders a thorough evaluation of their adequacy or effectiveness.

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

delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

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

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to granting consent, and the absence of such crucial information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These failures impede a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species, primarily due to underwater noise generated during construction activities. The high-energy hammer piling anticipated over an extended period is likely to cause disturbance across considerable distances, thereby affecting species including dolphins. The expected disturbance to a significant portion of the local bottlenose dolphin population raises critical concerns, yet the application minimises these effects without sufficient supporting evidence.

Additionally, the application demonstrates a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, particularly where harm is anticipated to the extent requiring legal authorisation.

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

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

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

TOURISM

The application presents a materially deficient assessment of tourism impacts, neglecting to 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 landscape, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the assessment fails to quantify how the proposed large-scale offshore infrastructure would influence visitor numbers, behaviour, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not evaluate

how the anticipated industrialisation of the seascape and the potential loss of environmental quality might affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of this analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Furthermore, the assessment overlooks the crucial role that environmental quality plays in tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experiences, including emerging markets like nature-based tourism and astro-tourism. The omission of a Dark Skies Assessment exacerbates this shortcoming, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

In an island community characterised by limited economic diversification, the lack of a thorough impact assessment on tourism holds broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the requisite to show a net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector, lacking sufficient evidence for the competent authority to assess the economic consequences of the proposal.

Altogether, the failure to quantify tourism impacts, to evaluate environmental drivers of visitor behaviour, and to consider the economic dependency of the island culminates in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

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

There are significant deficiencies in the evidential basis for this application. The absence of comprehensive baseline data, the continued use of an undefined design envelope, and reliance on unspecified mitigation measures create a lack of clarity. Key impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential tourism effects, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, hindering a thorough understanding of significant effects or residual impacts.

Procedural shortcomings further compromise the application. The failure to provide a compliant Island Communities Impact Assessment breaches the statutory obligations under the Islands (Scotland) Act 2018, while the incomplete Social Impact Assessment is a material omission. These oversights impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for consideration.

Moreover, the proposal directly contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are manageable. Additionally, the lack of tourism impact modelling means a net economic benefit cannot be substantiated. 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 linked to the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, necessitating the application of the precautionary principle and precluding a lawful conclusion regarding acceptable impacts.

Furthermore, the proposed project 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 negative effects on tourism represent permanent changes that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, in conjunction with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either deny consent based on these grounds or invoke relevant 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: 3C63AB81

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

Dear Sir/Madam

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

A critical issue with the application is its lack of an adequate evidential basis for lawful determination. The Environmental Impact Assessment Report and accompanying documents show that essential environmental data is missing, baseline information is limited and inconsistent, and important aspects of the proposal remain undefined. The flexible design framework employed prevents a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly assessed. Consequently, the documentation does not allow for a full understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are substantial policy conflicts evident in the application. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and jeopardise the ability of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of the proposal introduces additional concerns, with large turbines positioned close to the shoreline raising issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy guidelines demonstrates that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a complete and transparent account of the potential environmental effects

associated with the proposal. The flexibility of the Project Design Envelope, lacking a commitment to specific turbine dimensions or configurations, introduces considerable uncertainty and undermines the possibility of applying a worst-case scenario consistently. This deficiency compromises the integrity of the assessment, obscuring the true environmental impacts and hindering both public understanding and the competent authority's ability to grasp the actual extent of effects.

The application's heavy reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unspecified, is concerning. Consent is sought with the premise that any environmental harm will be mitigated later, thus obstructing a meaningful evaluation of their effectiveness and any assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to decision-making.

Additionally, there are considerable evidential gaps, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of impacts, particularly when conclusions suggesting negligible or non-significant effects lack robust supporting data. The insufficient information leads to a failure to understand cumulative and worst-case impacts, introducing a level of scientific uncertainty that contradicts 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 scenario invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it fails to provide assurance that impacts have been comprehensively assessed or that adequate safeguards are in place.

In summary, the combination of an ill-defined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These critical deficiencies inhibit a lawful and robust evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and reliable understanding of ecological receptors in this sensitive marine system. The methodologies employed are insufficient to accurately capture species presence, behaviour, and habitat utilisation, leading to a deficient evidential basis for evaluating impacts.

Particularly concerning is the omission of otters, classified as a European Protected Species, with the application failing to appropriately recognise their active use of coastal regions for foraging and movement. The neglect of their core foraging range and behavioural patterns undermines the assessment of potential impacts arising from construction disturbance, noise, and heightened activity. Consequently, this oversight casts doubt on the conclusions drawn regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys, which introduces a significant bias in detection, especially in the Atlantic conditions. This method likely leads to an underestimation of their presence in these waters, particularly when juxtaposed with established land-based observations that demonstrate frequent use. The omission of such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

The methodological shortcomings result in the conclusions regarding negligible or non-significant effects being based on assumptions rather than substantiated evidence. The lack of adequate baseline data hinders meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not adequately identify or assess protected species. The level of uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, the granting of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application lacks reliability, marked by significant internal inconsistencies and methodological weaknesses that undermine its findings. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already experiencing decline. Despite this, the application does not adequately demonstrate that these species will not be adversely affected. Key foraging areas and migratory pathways are situated within the development zone, yet the assessment fails to thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A critical contradiction arises within the application, where the developer asserts there

will be no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, an indication that significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment and suggests that the conclusions are unsupported by the available evidence.

The assessment falls short in demonstrating that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. Furthermore, the significance of these vital feeding grounds is inadequately considered. The reliance on modelling approaches introduces a level of uncertainty, especially for vulnerable species such as Kittiwakes and Fulmars, with the methodologies likely to underestimate potential mortality given the incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor poses an additional substantial risk by effectively creating a barrier in a key flight path utilised by species migrating between the United Kingdom and Iceland. The long-term consequences of ongoing mortality within this corridor are not sufficiently assessed, nor are the implications for species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the necessary evidential threshold to conclude there is no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and obstructs a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding the protection of biodiversity and natural assets. The failure to convincingly demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

Overall, these inadequacies render the assessment untrustworthy and compromise the ability to evaluate impacts thoroughly, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment concerning social impacts, health, and wellbeing is fundamentally flawed and lacks the necessary transparency for a valid evaluation. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report remains unpublished. This lack of disclosure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified by the developer's research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These effects stem from direct engagement, making them concrete rather than speculative. Nevertheless, the failure to release the full assessment limits scrutiny of these findings and restricts the ability to evaluate their importance within the decision-making framework.

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 own findings. Despite these concerns, they have not been adequately integrated into the main application or assigned appropriate significance. The withholding of the full Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By not providing the complete dataset, the application fails to establish a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence available indicates current adverse effects that remain inadequately disclosed. Without the full assessment, compliance with this policy cannot be substantiated.

The procedural ramifications are considerable. The competent authority is unable to perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material shortcoming within the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Methodological concerns further undermine the reliability of the visual assessment.

There is evidence suggesting that the selection and presentation of visual viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This risk of understating the magnitude of visual impact raises serious questions about the overall assessment's credibility.

A critical oversight is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting linked to the Atlantic horizon through visual and spatial relationships. Treating these assets as isolated fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents a significant cultural and spatial harm that has not been adequately assessed.

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

Finally, the impacts identified in the application cannot be effectively mitigated. Due to the height, scale, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in the assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental impacts. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment without providing fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures after consent has been granted, which obstructs any substantial assessment of their adequacy or effectiveness.

This approach raises particular concerns given the sensitivity of the receiving

environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be effectively prevented, controlled, or monitored.

Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation activities. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances. This uncertainty also pertains to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the ability to assess whether appropriate safeguards are established to address pollution events. This situation introduces procedural risk and hinders the competent authority's capacity to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements set forth in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, and any absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is incomplete and does not fully consider the impacts of what is a single integrated project. The offshore turbines and onshore works are inherently connected but are evaluated separately. This separation leads to a fragmented approach, obscuring the overall environmental and socio-economic effects.

Onshore components consist of cabling through protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure across sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all parts of a project must be considered together.

However, the division between offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and communities.

There are significant risks to sensitive habitats, including machair systems and peatland environments, which enjoy policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures are in place. This creates an evident gap in biodiversity protection.

The proposal also raises issues regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this matter or show that the overall carbon balance is beneficial.

Additionally, routing the infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, casting doubt on its deliverability and legal compliance.

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

Overall, the separation of project components, lack of a comprehensive assessment, and absence of evidence regarding environmental and land use impacts result in this portion of the application being incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal includes the introduction of permanent red aviation lighting that will be visible over long distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change will fundamentally alter the night-time environment of the West Lewis coastline, which is noted for its exceptionally dark skies that are essential to the area's environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment notably lacks any evaluation of the impacts of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This deficiency is particularly concerning given the significance of dark skies to the identity of the region and to emerging tourism sectors like astro-tourism. The failure to address these impacts indicates a clear gap in the overall assessment of both landscape and environmental conditions.

Moreover, the assessment does not consider the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and

Leach's Storm Petrel are particularly sensitive to artificial lighting, as phototaxis can lead to disorientation and a heightened risk of collision. The application is lacking a lighting impact assessment or a phototaxis study, thus failing to evaluate how the proposed aviation lighting may impact these species or contribute to increased mortality rates.

Additionally, the reliance on daytime survey data in the ornithological assessment is problematic, as it fails to account for nocturnal activity and its associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The absence of site-specific night-time data results in a critical gap in the understanding of ecological impacts.

Without an assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would face adverse effects. The evidential standard required to exclude potential adverse effects beyond reasonable scientific doubt is not met, thus engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, the omission conflicts with National Planning Framework 4 concerning the protection of natural places and environmental quality. This also diminishes the comprehensive evaluation of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

TOURISM

The assessment of tourism impacts is insufficient and neglects to consider 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 states that 86% of visitors are attracted by scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

Tourism has experienced considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience. Without this analysis, it is impossible to ascertain whether the development would produce a net economic benefit or harm an established and growing sector.

Moreover, the assessment overlooks the role of environmental quality in promoting tourism, including how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this shortcoming, creating a significant gap in understanding the impacts on a recognised and expanding part of the local economy.

Given the limited economic diversification within the island community, the failure to evaluate impacts on tourism carries broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not show adherence to National Planning Framework 4, especially concerning economic impact and the obligation to demonstrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the failure to quantify tourism impacts, evaluate environmental factors influencing visitor behaviour, and recognise the island's economic dependency culminates in a significant evidential gap. This undermines 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 requirements of sustainable development when evaluated against national policy, statutory duties, and evidential standards. This situation mirrors the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current application, although framed within a stronger policy context that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not substantiate its claims.

There are significant deficiencies in the evidential basis for the application, including critical gaps in baseline data and the use of an undefined design envelope. Furthermore, it relies on unspecified mitigation measures and fails to address key impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism impacts. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

The application also suffers from procedural inadequacies. Notably, the lack of a compliant Island Communities Impact Assessment is a breach of statutory duty as stipulated under the Islands (Scotland) Act 2018. Additionally, the omission of the complete Social Impact Assessment represents a material shortfall. These shortcomings hinder the competent authority's ability to evaluate impacts on

community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage. It fails to illustrate acceptable health and wellbeing impacts and cannot provide evidence of net economic benefits, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially severe. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and barring a lawful conclusion regarding the acceptability of impacts.

Additionally, 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, disruption of cultural and visual relationships, and negative impacts on tourism represent permanent changes that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The extensive information gaps, combined with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority must either refuse consent based on these grounds or invoke the appropriate regulatory provisions to require the submission of the missing information.

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

Additional Comments

This is not about climate, it is about profit, to the detriment of islanders and the beauty of Lewis. Overnight the dark skies will disappear, properties become impossible to sell and collapse in value. In every way a travesty.

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: 2A082C73

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 is fundamentally inadequate, failing to deliver a thorough, transparent, or reliable evaluation of the likely environmental

consequences of the proposal. A significant issue lies in the use of a flexible Project Design Envelope, which lacks commitment to precise turbine dimensions, layouts, or configurations. This ambiguity introduces considerable uncertainty and hampers a consistent assessment based on worst-case scenarios. As a result, the integrity of the assessment is compromised, preventing both the public and the competent authority from grasping the true extent of environmental effects associated with the development that may ultimately be constructed.

Furthermore, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach seeks consent on the premise that environmental harm will be addressed at a later stage, obstructing any meaningful evaluation of effectiveness or the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures be clearly defined prior to determination.

Additionally, there are critical evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

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

Collectively, the dependence on an undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. It lacks a structured comparison of realistic alternatives based on their environmental effects and instead provides a narrative of the project's evolution. This approach does not show that less harmful options have been properly identified or assessed in preference to more damaging ones.

There is no evidence-based comparison of alternative offshore locations, development scales, or design configurations. The application does not demonstrate that the developer considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be reduced. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in determining impact, the lack of such analysis undermines any conclusion that the proposed siting is the least damaging option.

The issues also extend to cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or lessen impacts on sensitive receptors, including culturally significant areas such as Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been applied, leading to reliance on post-design mitigation measures instead.

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

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The lack 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 assessment of marine ecology and protected species related to the application lacks completeness and reliability, failing to adequately understand the ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the baseline data provided is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, there is insufficient evidential support for evaluating potential impacts.

A significant shortfall in the assessment is the inadequate recognition and evaluation of otters, which are classified as a European Protected Species. The application does not consider their active usage of coastal regions for foraging and movement. The oversight of their core foraging range and behavioural habits results in an incomplete understanding of the possible effects of construction-related disturbance, noise, and increased activity. This lack of assessment weakens any claims regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks is also flawed, primarily due to an over-reliance on aerial surveys that introduce a considerable detection bias, especially under Atlantic conditions. This approach is likely to underestimate their presence, particularly when contrasted with established land-based observations which show frequent use of these waters. The neglect to incorporate or adequately consider such relevant data results in a deficient baseline, further undermining the reliability of the conclusions drawn.

The methodological shortcomings mean that any conclusions suggesting negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the true risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and assess protected species. The degree of uncertainty introduced by these deficiencies prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle. In light of these factors, it is not lawful to grant consent.

Overall, 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, ultimately leading to the conclusion that the application lacks a solid 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 evaluation of cultural heritage and community identity is deeply flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community intertwine. The application reduces heritage to isolated, static elements, failing to acknowledge their dynamic social, cultural, and spiritual roles within the community.

Significant shortcomings arise in the treatment of culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial sites and places of spiritual significance, yet they are characterised merely as static features, overlooking their ongoing use, importance, and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects, disregarding their vital role in community life.

The application also neglects to account for intangible cultural heritage, such as the

Gaelic language and traditions, as well as the enduring bond between the community and the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the assessment, creating a substantial gap in understanding the cultural impact of the development.

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

A major procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, a legal requirement under the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

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

When considered collectively, the disregard for living heritage, intangible cultural value, community rights, and statutory duties results in a significant evidential void. The cultural impacts of the development remain inadequately assessed, and the application fails to provide a sound basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Available summaries reveal that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the development. These impacts are based on direct engagement and are not speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of these findings, thereby limiting the capacity to assess their significance in the decision-making process.

There is also notable evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's

findings. Despite this, such impacts have not been adequately integrated into the main application nor given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient. It fails to adequately reflect both the scale of change and the sensitivity of the receiving environment, resulting in a continuous and dominant industrial presence that would fundamentally alter the character of the landscape. This alteration would lead to a permanent and irreversible transformation.

Furthermore, the application does not appropriately represent the magnitude of the visual changes anticipated. 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 diminishing the qualities of naturalness and remoteness that currently define the area. The assessment does not convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns also arise regarding the selection and presentation of visual viewpoints in the assessment. Evidence indicates that the viewpoints chosen may not adequately represent the most sensitive receptors or account for worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the potential that the visual impact has been understated, which undermines the reliability of the assessment.

Another notable deficiency is the failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context connected to the Atlantic horizon through visual and spatial relationships. The assessment treats these assets as isolated, neglecting their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed 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 a significant visual impact and a broader cultural and spatial harm that has not been adequately assessed in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is inadequate, lacking the necessary detail to assess the potential environmental impacts. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans, which results in a reliance on mitigation and contingency measures that are to be formulated post-consent. This

approach hinders any meaningful evaluation of their potential effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on unspecified future measures raises serious concerns. The West Lewis coastline is home to clean coastal waters and significant habitats that are particularly susceptible to sediment disturbance and contamination. The application identifies risks, including sediment mobilisation and possible chemical or oil spills, yet fails to provide comprehensive details on preventative, control, or monitoring strategies for these risks.

Moreover, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also affects potential repercussions for marine species and habitats that have already been recognised as vulnerable within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application obstructs the assessment of whether adequate safeguards are in place for responding to pollution incidents. This introduces procedural risks and weakens the competent authority's capacity to evaluate environmental protection measures before making a determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements stipulated by the Environmental Impact Assessment framework. It is essential that likely significant effects and mitigation strategies are evaluated prior to consent. The absence of this information renders a lawful determination impossible. Furthermore, the application does not adequately demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially incomplete. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is not sufficiently robust.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life associated with this application is inadequate and does not provide a thorough evaluation of the ecological or socio-economic impacts involved. The waters off the West Lewis coast not only host a diverse marine ecosystem but also support an active fishing industry. However, the application fails to prove that these vital uses and habitats can be protected or maintained without significant disruption.

A major concern arises from the assumption that fishing activity can be displaced without any adverse consequences. There is no evidence provided that alternative fishing grounds exist, are accessible, or can sustain additional pressure. This is a significant oversight, as such displacement could lead to overfishing in other areas and potentially harm the local fishing fleet's economic viability. Without a sound and evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, primarily due to the underwater noise produced during construction. The prolonged use of high-energy hammer piling is likely to cause disturbances over large distances, affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application tends to downplay the seriousness of these effects, lacking sufficient supporting evidence.

There is also a glaring inconsistency within the application itself; it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction calls into question the reliability of the assessment and raises concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

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

In conclusion, the absence of evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions collectively render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the project fails to provide a complete assessment of onshore infrastructure, which results in an incomplete understanding of the impacts associated with what is a single integrated project. It is essential to recognise that the offshore turbines and the onshore works are intrinsically linked; however, they are assessed separately, creating a fragmented approach that obscures the true scale of the environmental and socio-economic effects.

Onshore elements of the project include cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is a significant carbon store and an ecologically sensitive habitat. The application does not present a comprehensive assessment of these impacts, which hinders a full understanding of the project's overall environmental footprint.

Moreover, by excluding or deferring the assessment of onshore impacts, the application limits the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered together, yet the disconnection between the offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, both of which receive policy protection. The application fails to demonstrate that the impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented. This omission creates a significant evidential gap concerning biodiversity protection.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

Additionally, the application does not evaluate how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important given the role of dark skies in the area's identity and the growth of tourism sectors such as astro-tourism. The lack of consideration for these effects indicates a significant gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the potential effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting because of phototaxis, which can lead to disorientation and a higher risk of collision. The proposal lacks any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting might affect these species or increase mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity and associated risks. Species like Kittiwakes may forage or migrate at night and are similarly vulnerable to disorientation from artificial lighting. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

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

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

Overall, the lack of assessment concerning dark skies and nocturnal wildlife represents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unfit for lawful determination.

TOURISM

The economic impact assessment associated with this application is fundamentally flawed and does not adequately address the implications for a vital sector of the Isle of Lewis economy. With 86% of visitors attracted by the area's stunning scenery, the application should have quantified how large-scale offshore infrastructure would influence visitor numbers, their behaviours, and the overall economic contribution of tourism. Instead, it neglects to model the potential consequences of industrialising the seascape and degrading environmental quality on tourism's Gross Value Added and the broader economic resilience of the island.

Tourism has seen remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing as much as 16% of the island's economy. This growth highlights the critical importance of tourism to the local community, yet the application fails to assess how the proposed changes could compromise this established and burgeoning sector. The absence of a thorough analysis leaves uncertainty regarding whether the development could provide any net economic advantage.

Environmental quality is essential to the tourism sector, particularly the preservation of unspoiled landscapes and dark skies that enhance the visitor experience and support emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, creating a significant gap in understanding the proposal's potential impacts on an increasingly recognised facet of the local economy.

In an island community characterised by limited economic diversification, the neglect to evaluate tourism impacts raises broader concerns about employment, the viability of local businesses, and community sustainability. Furthermore, the lack of 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 the National Planning Framework 4, especially regarding economic impact and the necessity of proving net benefit. It also fails to align with strategic goals that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic repercussions of the proposal adequately.

Overall, the combined shortcomings in quantifying tourism impacts, assessing environmental influences on visitor behaviour, and considering the island's economic dependencies create a considerable evidential void. This absence hinders a comprehensive assessment of the economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its failure to meet the standards for sustainable development as required by statutory obligations, national policy, and evidential standards. This application echoes the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not adequately address these critical elements.

The evidential basis for the application is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and the mitigation measures proposed have not been specified. Furthermore, the assessment

overlooks important impact pathways, including those affecting nocturnal wildlife, the full extent of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete and fails to facilitate a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment violates statutory duties established by the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment represents a significant omission. These failures hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In addition, the proposal is in direct contradiction to National Planning Framework 4. It does not satisfactorily demonstrate the protection of biodiversity, natural areas, or cultural heritage, nor does it show that the health and wellbeing impacts are acceptable. The absence of modelling for tourism impacts further undermines any claim of net economic benefit. The cumulative impacts of both offshore and onshore components have not been thoroughly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this project remain uncertain and could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstruct the ability to make a lawful and evidence-based decision. Therefore, the competent authority must refuse consent based on these grounds or invoke appropriate regulatory provisions to compel the submission of the outstanding information.

For these reasons, a formal request is made to refuse the application for the Spiorad na Mara Offshore Wind Farm in its entirety.

Additional Comments

My objection is due to the disregard of our natural environment, the effect on marine life and the ecosystems. Disruption to peat releases CO₂ and cannot be replaced. Exactly what environmentalists say don't do but in the 'Green washing' it's

OK. No it's not OK. These massive turbines have a dramatic effect on everyone around be it locals who have to live with them or tourists. We need to protect our few Wild areas left in the UK. I've seen the distruction and negative impact in Shetland. No cheap electricity for us in fact much higher than anywhere else in UK. All the money goes to the companies, not even a UK company. In the case of Shetland the tax payers pays for them to be idle for years before they get the batteries and undersea cables in place this is millions of pounds a month. It's an absolute disgrace. The battery storage is a whole issue in itself. The turbines are one thing, the batteries take up huge areas and the ugly infrastructure to take the electricity onwards.

How are they going to be dismantled at end of life and the cost and recycling of that is a whole other issue. I strongly object having seen the negative impact on Shetland. No it doesn't bring in job in any significant numbers and yes it does cause negative impact on the whole environment. As for green energy it just ticks a box for the governments green targets.

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: 41DCA68F

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 frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The project is set to be located off the west side of the Isle of Lewis, a region renowned for its Atlantic-facing coastline, nearly untouched natural environment, and deep-rooted cultural identity. Concerns regarding the scale, proximity, and design of this development raise serious questions about its alignment with statutory requirements, national policies, and the core principles of sustainable development.

The application itself lacks an adequate evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is scarce and inconsistent, and several key facets of the proposal are still not clearly defined. Moreover, the use of a flexible design framework obscures the understanding of potential significant impacts, while the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to provide a complete or informed perspective on environmental, cultural, or community repercussions, leaving unsupported claims of negligible or non-significant effects.

There are notable and significant conflicts with established policy frameworks. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly regarding biodiversity, natural landscapes, cultural heritage, and public health. It does not successfully illustrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts fundamentally challenge the statutory tests necessary for consent and compromise the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of this proposal poses additional concerns, with large turbines planned in close proximity to the shoreline, raising serious issues about landscape capacity, visual impact, and environmental consequences. Collectively, the lack of sufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to facilitate a lawful decision. In light of these circumstances, it is essential that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential information and does not adequately detail the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates substantial uncertainty. This situation hinders the assessment's integrity and results in potential discrepancies between the reported impacts and the actual development, leaving both the public and the competent authority without a clear understanding of the true environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental damage will be managed later prevents a thorough evaluation of the effectiveness and residual impacts of these measures. This postponement of critical information until after consent is granted is procedurally improper and contradicts the objectives of the Environmental Impact Assessment process, which stipulates that significant effects and mitigation strategies must be clearly outlined before a decision is made.

There are also notable shortcomings in evidence, including insufficient baseline data, methodological limitations, and the use of assumptions rather than site-specific information. These issues lead to uncertainty about the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting evidence. The lack of comprehensive information hampers the understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that does not align with statutory expectations.

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

In summary, the combination of an undefined design envelope, lack of specified mitigation measures, and deficiencies in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These flaws impede a lawful and comprehensive evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The absence of a comprehensive and structured assessment of alternatives significantly undermines the application's compliance with the statutory requirements set out by the Environmental Impact Assessment regime. Instead of offering a reasoned and transparent evaluation of viable alternatives based on their environmental implications, the application merely recounts the evolution of the project. This narrative

approach fails to prove that less harmful options have been thoroughly identified and evaluated in preference to those with greater potential for damage.

Moreover, there is no evidence-based or transparent comparison regarding alternative offshore locations, development scales, or design configurations. The developer has not convincingly explored the possibility of siting turbines further offshore, where the potential for visual, ecological, and coastal impacts may be mitigated. The sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impacts make the lack of such analysis particularly concerning. This shortcoming prevents any reasonable conclusion regarding whether the proposed location represents the least damaging option available.

The shortcomings are also evident in the assessment of cable routing and landfall, where there is inadequate evidence demonstrating that alternative routes have been properly considered to avoid or minimise 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 measures have not been integrated into the design phase, relying instead on post-design mitigation approaches.

Consequently, the application does not establish that environmental harm has been minimised through site selection, layout, and infrastructure routing. This oversight signifies a breach of the established mitigation hierarchy, thus preventing the competent authority from assessing whether more appropriate and less harmful alternatives could be available. In the absence of a robust assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with relevant policy frameworks.

From a policy standpoint, this inadequacy raises serious concerns regarding compliance with National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission that leads to the conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species lacks completeness and does not offer a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system that is highly sensitive; however, the baseline data provided is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

Significant gaps exist in the consideration of otters, a species protected under European law, as the application does not adequately recognise or assess their use of

coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns leads to an inadequate evaluation of the potential impacts from construction disturbance, noise, and increased activity. This oversight undermines any conclusions suggesting the absence of significant effects on this species.

Deficiencies also emerge in the assessment of basking sharks, as the dependence on aerial surveys introduces considerable detection bias, particularly in the prevailing Atlantic conditions. This reliance is likely to underestimate their presence compared to established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider this data results in an incomplete baseline, which further undermines the reliability of the conclusions drawn.

These methodological shortcomings indicate that the conclusions of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This scenario creates uncertainty about the real scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the necessary requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of 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 issues prevent a robust evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application is built on an insufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis threatens internationally important seabird populations, which are already experiencing declines. The ornithological assessment associated with the application is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that compromise its conclusions. It fails to adequately demonstrate that these species will not face adverse effects, particularly since the turbines are sited within key foraging areas and migratory pathways. The assessment lacks a robust evaluation of displacement, collision risk, or habitat loss, which is essential for understanding the potential impacts on these vulnerable birds.

Furthermore, the application presents a contradiction by asserting that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and

indicates that its conclusions are not sufficiently supported by evidence. It does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. Additionally, the methodologies applied likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not well understood.

The placement of turbines in a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term implications of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, fails to achieve the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and undermines a lawful conclusion in favour of consent. Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development lacks a thorough assessment of cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets. This view fails to acknowledge the area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined.

In particular, the treatment of significant sites such as the cemeteries at Dalmore, Bragar, and Barvas is a major shortcoming. These sites are not merely historical features; they serve as active places of burial and spiritual practice. However, the assessment categorises them without considering their ongoing use and the implications of development on their surroundings. This misrepresentation results in an incomplete evaluation of the cultural effects, neglecting their importance in community life.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the development.

Moreover, there are notable concerns surrounding community rights and engagement. The Gaelic-speaking population, which embodies the distinct characteristics of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. The absence of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles regarding participation in decisions that affect cultural and environmental interests.

A critical procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community, preventing a lawful determination of the proposal.

From a policy standpoint, these inadequacies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and sites. The neglect to consider both tangible and intangible heritage, along with the failure to recognise living cultural practices, signifies a clear departure from policy requirements.

Ultimately, the collective failure to evaluate 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 assessed, and the application lacks a sufficient foundation for determining the true cultural cost of the proposed development.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report remains unpublished. This lack of transparency represents a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified through the developer's own research.

Available summaries suggest that residents are currently dealing with measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, based on direct engagement, are not speculative, yet the failure to disclose the complete assessment hampers proper scrutiny of these findings and restricts the assessment of their significance in the decision-making process.

Furthermore, evidence indicates that the proposal is viewed as a direct threat to community identity and cohesion, with references to “cultural loss” found in the

developer's own findings. Despite this recognition, these impacts have not been adequately integrated into the main application or afforded appropriate weight. The withholding of the full Social Impact Assessment obscures the genuine human and social cost associated with the development, undermining the Environmental Impact Assessment process.

A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at stake. By not supplying the complete dataset, the application does not present a comprehensive evidential basis for assessing the balance between benefits and harms.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence at hand indicates existing adverse effects that have not been fully disclosed. Without the full assessment, it cannot be established that compliance with this policy has been achieved.

The procedural implications are notable, as the competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This omission represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines in close proximity to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The presence of these turbines would create a continuous industrial landscape, fundamentally altering the character of this environment and resulting in a permanent and irreversible transformation.

The assessment provided fails to adequately reflect the magnitude of the visual change that would occur. The scale and proximity of the turbines mean they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the qualities of naturalness and remoteness. This assessment does not convey the true level of impact, particularly in the context of such a sensitive landscape.

Methodologically, there are concerns regarding how visual viewpoints have been selected and presented. It appears that these viewpoints may not capture the most

sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight introduces the risk of underestimating the magnitude of visual impact, thus calling into question the reliability of the assessment.

Another critical deficiency is the failure to assess the interconnectedness of landscape, seascape, and cultural heritage. Important sites, including 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 considers these sites in isolation, 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 vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This issue presents not just a visual impact but also a broader cultural and spatial harm that has not been adequately explored within the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change associated with the turbines is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further undermines any assertions of compliance with policy.

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. The resulting change is fundamental and permanent, rather than something that could be lessened to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

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

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills,

it fails to provide sufficient detail on how these risks will be prevented, controlled, or monitored. Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to marine species and habitats that have been identified as sensitive in the broader assessment.

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

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

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

FISHERIES AND MARINE LIFE

The evaluation of the application is fundamentally inadequate, particularly concerning the impacts on marine life and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to adequately ensure that these essential habitats and industries will be protected from significant disruption.

A major concern is the erroneous assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence to suggest that alternative fishing grounds exist or are capable of accommodating the displaced activities without incurring additional pressures. This lack of information is critical, as such displacement could lead to overfishing in other areas, thereby threatening the livelihoods of local fishers and the local economy. Without a thorough, evidence-based assessment, the effects on fisheries and the communities reliant on them remain poorly understood.

Additionally, the proposal poses notable threats to marine species, particularly due to the underwater noise associated with construction activities. The anticipated use of high-energy hammer piling for extended periods is likely to cause widespread

disturbance, particularly affecting species such as dolphins. The potential impact on a significant portion of the local bottlenose dolphin population is of considerable concern, yet the application minimises these risks without sufficient evidence to support its conclusions.

There is also an evident contradiction within the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously classifying the impacts as negligible. This inconsistency undermines the overall credibility of the assessment and raises serious questions about adherence to the Habitats Regulations, especially when harm is indicated to a degree that would require legal permissions.

Furthermore, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to determine the overall consequences for marine ecosystems and local socio-economic conditions.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which precludes 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 contradictions all contribute to an incomplete and unreliable assessment. These shortcomings hinder a thorough evaluation of the potential impacts on both marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a complete assessment of onshore infrastructure, which is critical for understanding the full impacts of this integrated project. The offshore turbines and onshore works are connected, yet they have been assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly in Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint.

By 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 project components be considered together, but the

separate assessments of offshore and onshore elements mean that the combined impacts on peatlands, habitats, and communities are not fully recognised.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not show that it has fully assessed the impacts on these habitats or that it has applied appropriate avoidance measures, leading to a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not sufficiently address this issue or demonstrate that the overall carbon balance is advantageous.

Routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, raising doubts about deliverability and legal implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment of dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a substantial oversight. The West Lewis coastline is noted for its exceptionally dark skies, which are integral to the area'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 disruptive "wall of light" that would significantly alter the night-time atmosphere.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly important considering the role of dark skies in the identity of the region and the growth of tourism sectors such as astro-tourism. As a result, this failure leads to a considerable gap in the comprehensive landscape and environmental assessment.

Additionally, there is no consideration of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are

known to be highly sensitive to artificial lighting, which can result in disorientation and an increased risk of collision. The proposal lacks a lighting impact assessment or a study on phototaxis, meaning it fails to evaluate how aviation lighting may affect these vulnerable species or contribute to increased mortality rates.

This deficiency is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or the associated risks. Kittiwakes, for instance, may forage or migrate during the night, and the disorientation caused by artificial lighting poses a risk that has not been addressed. The lack of specific night-time data is a critical gap in understanding the ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, which engages the precautionary principle and hampers 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 undermines a broader assessment of landscape and seascape impacts, as the character of the night forms a crucial element 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 unable to support 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 proposal for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the requirements for sustainable development as dictated by statutory duties, national policy, and evidential standards. It echoes the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application falls short in several key areas.

There are serious deficiencies in the evidence provided for assessment. The proposal lacks a comprehensive and reliable evidential basis, with critical gaps in baseline data and the use of an undefined design envelope. It relies on unspecified mitigation measures and neglects to address important impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, failing to provide a clear understanding of the likely significant effects or any residual impacts.

Moreover, there are notable procedural shortcomings. The omission of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact

Assessment represents a significant oversight. These inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

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

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times internally inconsistent. The evidential standard needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal would bring about substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the impacts on tourism represent lasting effects that cannot be mitigated to an acceptable level.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, along with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either denies consent based on these grounds or exercises the appropriate regulatory measures to require the submission of the necessary missing information. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D32183A3

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment regulations. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The dimensions and design of the project, alongside its proximity to the shore, raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential basis to support a lawful determination. Essential environmental data is absent, baseline information is scarce and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework complicates the understanding of potential significant effects, and the reliance on unconfirmed mitigation measures renders their effectiveness unassessable. Consequently, the submitted documentation does not allow for a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There exist notable and serious policy conflicts. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It fails to establish that it can meet national obligations to safeguard biodiversity, climate priorities, and environmental integrity. These discrepancies directly affect the statutory assessments required for consent and hinder the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the project in this area, with substantial turbines placed in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations indicates that the application is incomplete and cannot sustain a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

Moreover, the assessment contains notable evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly in instances where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that fail to meet statutory obligations.

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

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

ASSESSMENT OF ALTERNATIVES

The application proposes a development that does not adhere to the necessary statutory requirements of the Environmental Impact Assessment regime. Instead of offering a coherent and evidence-based comparison of realistic alternatives concerning environmental effects, it provides a narrative of how the project has evolved. This

narrative does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and chosen over more damaging solutions.

There is a lack of transparency and an absence of evidence in the comparison of alternative offshore locations, development scales, or design configurations. Notably, the application fails to show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be diminished. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact, the lack of such analysis means it cannot be concluded that the proposed siting is the least damaging option.

The shortcomings also extend to the evaluation of cable routing and landfall assessment. There is insufficient evidence that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with a lack of comparative analysis, suggests that mitigation by design has not been appropriately applied, leading instead to reliance on post-design mitigation measures.

Consequently, the application does not illustrate that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This signifies a departure from the established mitigation hierarchy and leaves the competent authority unable to ascertain whether more suitable and less harmful alternatives are available. Without a comprehensive assessment of alternatives, it cannot be established that the proposal is sustainable or compliant with policy requirements.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment provided concerning marine ecology and protected species is lacking in crucial areas and fails to offer a thorough and trustworthy understanding of ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically rich marine system. However, the absence of comprehensive baseline data and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One significant gap pertains to otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active foraging and movement in coastal areas. This oversight regarding their core foraging range and

behavioural patterns leads to an inadequate evaluation of the potential effects of construction-related disturbances, noise, and increased activity. Such shortcomings undermine any conclusions drawn about the absence of significant effects on this species.

Further shortcomings are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared with established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such data results in an incomplete baseline, further compromising the reliability of the conclusions reached.

These methodological flaws mean that assertions of negligible or non-significant effects are primarily grounded in assumptions rather than substantiated evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty surrounding the true scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The level of uncertainty involved hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thus activating the precautionary principle. Under these conditions, it is unlawful to grant consent.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These issues hinder a thorough evaluation of impacts on marine ecology and protected species and lead to the overall determination that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application raises significant concerns regarding its reliability and thoroughness, primarily due to internal inconsistencies and substantial evidence gaps. It is critical to note that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing declines. The application fails to sufficiently demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. Key foraging areas and migratory pathways, which are crucial for these birds, are affected by the proposed development. However, the assessment does not adequately address the implications of potential displacement, collision risks, or habitat loss.

A notable contradiction is evident within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats

Regulations derogation case, which is typically needed when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and indicates that its conclusions are not underpinned by solid evidence. The assessment lacks adequate evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is insufficiently acknowledged, and the use of modelling approaches introduces further uncertainty, particularly for species experiencing severe declines, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in the context of incomplete baseline data and incomplete understanding of species' behavioural responses.

The positioning of turbines within an acknowledged migratory corridor poses additional significant risks, as it effectively creates a barrier along a primary flight route for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, which precludes a lawful conclusion in favour of consent.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment provided for the proposed development overlooks vital aspects of cultural heritage and community identity, particularly in relation to the West Lewis coastline. This area embodies a living cultural landscape where the environment, language, tradition, and community are interconnected. Instead of recognising these dynamic relationships, the application reduces heritage to a collection of static assets, neglecting their ongoing social, cultural, and spiritual significance within the community.

A significant shortcoming in the assessment is its treatment of culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These cemeteries

serve as active sites of burial and spiritual practice, yet they are presented as static features, disregarding their continued use and the implications of development on their surroundings. This misrepresentation leads to an inadequate evaluation of cultural effects and overlooks the role these sites play in community life.

Moreover, the application does not address intangible cultural heritage, which includes the Gaelic language, local traditions, and the longstanding relationship that the community has with the coastal environment. These elements are critical to the area's identity but are completely missing from the assessment, indicating a significant oversight. Without acknowledging these factors, the full cultural impact of the development remains obscured.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised under the characteristics of an Indigenous People, yet the process of Free, Prior and Informed Consent has not been followed. This lack of meaningful engagement calls into question the validity of the assessment and does not adhere to established principles for participation in matters that affect cultural and environmental interests.

Additionally, there is a critical procedural flaw due to 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, which prevents a lawful determination of the application.

From a policy standpoint, these oversights create direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, and the recognition of living cultural practices, represents a clear deviation from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and the necessary statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the available evidence suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a substantial omission within the application, failing to meet the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

FISHERIES AND MARINE LIFE

The overall assessment of the proposal is fundamentally flawed due to numerous deficiencies that undermine its credibility. A significant concern is the failure to adequately evaluate the socio-economic impacts on the active fishing industry and the diverse marine ecosystem off the West Lewis coast. The application does not provide evidence that alternative fishing grounds can accommodate any displacement resulting from the proposed activities. This raises critical questions regarding the sustainability of local fisheries, as the potential for overfishing in other areas poses

wider economic risks for the local fleet.

Furthermore, the assessment underestimates the impact of underwater noise, particularly from high-energy hammer piling, which is anticipated to disrupt marine life over extensive areas. The concerns surrounding the disturbance to the local bottlenose dolphin population are serious, yet the application downplays these effects, lacking sufficient evidence to justify this stance. There is a troubling contradiction within the application itself; while it acknowledges the necessity of licenses to allow for harm to European Protected Species, it simultaneously claims that the anticipated impacts are negligible. This inconsistency calls into question compliance with the Habitats Regulations and the overall integrity of the assessment process.

Moreover, the assessment does not take into account the cumulative impacts stemming from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined factors, it is impossible to ascertain the full effects on marine ecosystems and the socio-economic conditions that depend on them.

From a policy perspective, the application falls short of demonstrating compliance with the National Planning Framework 4 and the National Marine Plan. It fails to establish that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity. This lack of evidence regarding fishing displacement, coupled with the underestimation of acoustic impacts and the internal inconsistencies present, ultimately renders the assessment incomplete and unreliable. Thus, a robust evaluation of the impacts on marine life and fisheries remains unachievable.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of the onshore infrastructure, which is materially incomplete. It neglects to consider the full scope of impacts resulting from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically connected; however, their separate assessments lead to a fragmented understanding that obscures the true scale of environmental and socio-economic effects.

Among the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and associated access infrastructure that traverses sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, an area recognised for its ecological sensitivity and as a significant carbon store. The absence of a thorough evaluation of these impacts inhibits a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application hinders an appropriate evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered in conjunction.

However, the distinct treatment of offshore and onshore elements results in an insufficient understanding of the combined impacts on peatlands, habitats, and local communities.

The proposal also raises significant concerns regarding sensitive habitats, including machair systems and peatland environments, which are afforded policy protection. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, thus highlighting a substantial evidential gap in relation to biodiversity protection.

Additionally, the routing of infrastructure through active croft land introduces potential conflicts with established land use and legal rights. There is a lack of evidence indicating that the necessary consents or processes have been initiated, which raises concerns about the deliverability and lawful execution of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife stands out as a critical shortfall in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which play a vital role in defining the area's environmental quality, cultural identity, and tourism potential. The proposal's introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time landscape.

Moreover, the application fails to consider how this lighting will impact visual amenity, landscape character, and the overall experience of both residents and visitors. This oversight is particularly concerning given the significance of dark skies for the region's identity and the emerging tourism sector focused on astro-tourism. As a result, the assessment presents a stark gap in the overall evaluation of the landscape and environmental effects.

The lack of evaluation extends to nocturnal wildlife, with no assessment provided for species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are highly sensitive to artificial lighting. This failure to address the potential risks, including disorientation and increased mortality due to collision, is

troubling. Furthermore, the ornithological assessment's dependence on daytime survey data fails to account for nocturnal activities and the associated dangers. Species like Kittiwakes, which may forage or migrate at night, remain vulnerable to disorientation from artificial lighting, yet this risk has gone unexamined. The absence of site-specific night-time data leaves a critical void in understanding the ecological implications.

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

From a policy standpoint, these omissions clash with National Planning Framework 4, particularly concerning the safeguarding of natural areas and the quality of the environment. Additionally, this neglect undermines the broader analysis of landscape and seascape impacts, as the character of the night-time environment is integral to the overall ecosystem.

Collectively, the absence of any evaluation related to dark skies and nocturnal wildlife signifies a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unfit 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 application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the standards of sustainable development as required by statutory duties and national policy. It mirrors the key issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to address these critical areas adequately.

A major concern is the lack of a complete and reliable evidential basis for the application. There are significant gaps in baseline data, an undefined design envelope is still in use, and there is a heavy reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Procedural failures are evident in the application as well. The absence of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the lack of a full Social Impact Assessment represents a substantial 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 consideration.

Furthermore, the proposal contradicts the National Planning Framework 4, lacking

evidence for the protection of biodiversity, natural areas, and cultural heritage. It does not demonstrate that the impacts on health and wellbeing are acceptable, nor does it provide evidence of a net economic benefit due to the absence of tourism impact assessments. The cumulative impacts of both offshore and onshore components have not been appropriately evaluated, leading to a lack of clarity regarding the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold required to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been satisfied. This engages the precautionary principle, thereby precluding a lawful conclusion regarding the acceptability of the impacts.

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

In summary, the application presents both procedural and substantive deficiencies that render it unfit for determination. The extent of the informational gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

I take holidays on the isle of Lewis specifically for its untouched natural beauty. It is one of the ever decreasing untouched natural environments left in the UK and should be cherished. Building this monstrosity anywhere in the Highlands of Scotland should be outlawed, especially when it will be owned by a foreign company and brings zero benefit to the local economy and community. This so called renewable technology will have a lasting impact on the ecology of the earth through the sourcing and extraction of the materials to make it, which in themselves are non recyclable and will in turn contaminate the earth through their disposal. All this to put profit into the Canadian company's pocket, what lunatic thinks this is a good 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: 5216AD11

