

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment processes. The objection arises from a review of the Environmental Impact Assessment Report and related documents. It highlights significant deficiencies in planning, environmental considerations, cultural impacts, and procedural aspects. The project is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised regarding the proposal's scale, proximity to the shoreline, and design, as these factors challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful determination. Important environmental data is absent, baseline information is insufficient and inconsistent, and vital components of the proposal remain undefined. The use of a flexible design framework does not allow for a clear assessment of likely significant effects, while the reliance on unspecified mitigation measures means their efficacy cannot be evaluated. Consequently, the documents fail to provide a comprehensive understanding of environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There are notable and significant conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly relate to the statutory tests required for consent and weaken the competent authority's ability to determine the development's acceptability in policy terms.

The proposal's scale is unprecedented for this area, with large turbines sited near the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental effects. Overall, the lack of sufficient information, dependence on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent account of the potential environmental impacts of the

proposal. The proposal employs a flexible Project Design Envelope that does not commit to specific turbine dimensions, layouts, or configurations. This lack of certainty leads to significant risks as it undermines the ability to apply a worst-case scenario consistently. Consequently, the effects outlined may not accurately represent what will be constructed, limiting both public understanding and the competent authority's ability to assess true environmental impacts.

The application heavily depends on undefined mitigation measures, monitoring strategies, and management plans, which have yet to be established. Consent is sought under the premise that any environmental harm will be addressed subsequently. This deferral to later stages hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such an approach is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and their mitigations are to be clearly identified prior to decision-making.

Moreover, there are substantial evidential shortcomings, including insufficient baseline data and methodological limitations, leading to the reliance on assumptions rather than site-specific evidence. This results in uncertainty around the scale and significance of impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting data. The lack of information fails to provide a thorough understanding of cumulative and worst-case impacts, thus introducing a scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not meet the evidential standards set by the Habitats Regulations, which necessitate the exclusion of 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. It cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the dependence on an ambiguous design envelope, the lack of specified mitigation measures, and the presence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies prevent a lawful and rigorous evaluation of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information presented.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vital 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 treats heritage merely as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are categorised as static features in the assessment. This approach neglects their continued use and meaning, failing to consider how development could affect their setting and, ultimately, their role in community life.

Moreover, the assessment lacks consideration of intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring connection between the community and the coastal environment. These elements are essential to the area's identity, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population holds a distinct cultural identity, recognised as Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a legal 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, making the determination of the proposal unlawful.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to adequately consider both tangible and intangible heritage, as well as to recognise living cultural practices, marks a clear deviation from policy requirements.

In summary, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a substantial evidential gap. The cultural impacts of the development have not been appropriately evaluated, and the application does not provide a robust basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Residents are currently facing measurable stress, anxiety, and concern due to the

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposed development is fundamentally flawed and does not adequately convey the scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic views, its undeveloped nature, and a profound sense of isolation. The planned installation of large turbines near the shoreline would impose an overwhelming industrial presence that would drastically alter this landscape, leading to a permanent and irreversible change in its character.

Moreover, the application fails to adequately represent the extent of visual change

anticipated. The scale and proximity of the turbines are such that they would overshadow views from residential zones, historic sites, and popular coastal areas. This would significantly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment has not effectively communicated the severity of these impacts or their significance within this sensitive landscape context.

Methodological shortcomings further undermine the evaluation, especially regarding the selection and representation of visual viewpoints. It appears that some viewpoints do not sufficiently capture the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been understated, casting doubt on the assessment's overall reliability.

Additionally, there is a critical oversight in evaluating the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially tied to the Atlantic horizon. The assessment treats these assets in isolation without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which these heritage assets are appreciated and breaking their link to the natural horizon. This not only results in visual impacts but also inflicts broader cultural and spatial damage that the application has not adequately addressed.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The extent of change proposed is fundamentally incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case scenario assessment further weakens any argument of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be dominant and impossible to overlook. The resulting transformation of the landscape is thus fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment inadequately reflects the scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These significant deficiencies hinder a reliable evaluation and reinforce the conclusion that this proposal is not compatible with the protection of the landscape.

FISHERIES AND MARINE LIFE

The application proposes a development that significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate ecological and

socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these vital uses and habitats can be protected or maintained in the face of potential disruptions.

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. As a result, without an evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended timeframe is likely to disturb species over large distances, notably impacting the local bottlenose dolphin population. Concerns regarding the predicted disturbance to a significant proportion of these dolphins are serious, yet the application appears to downplay these effects without providing adequate supporting evidence.

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

The assessment is lacking in its consideration of cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These issues ultimately hinder a robust evaluation of the impacts on marine life and fisheries.

TOURISM

The Isle of Lewis tourism sector is vital, having grown 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. The assessment of tourism impacts related to the current application is materially deficient. It fails to evaluate the economic and social consequences for this key sector. While the application acknowledges that 86% of visitors are drawn by scenery, it does not quantify how large-scale offshore infrastructure could affect visitor numbers, behaviour, or overall economic contributions.

The assessment neglects the critical role of environmental quality in supporting tourism. Factors such as unspoiled landscapes and dark skies greatly enhance visitor experience, particularly for emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, leaving a significant gap in understanding the impact on a recognised and growing segment of the local economy.

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

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

Overall, the lack of a thorough evaluation of tourism impacts, the failure to consider environmental drivers of visitor behaviour, and the neglect of the island's economic dependency create a significant evidential gap. This undermines 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 represents a significant failure to meet the criteria for sustainable development as required by statutory duties, national policy, and evidential standards. This application echoes 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 the introduction of a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current proposal fails to adequately address these concerns.

A reliable evidential basis for determination is not provided in the application. There are notable deficiencies in baseline data, reliance on an ill-defined design envelope, unspecified mitigation measures, and key impact pathways such as nocturnal wildlife,

full onshore infrastructure, and tourism effects are omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects or residual impacts.

There are procedural failures present in the application. The lack of a compliant Island Communities Impact Assessment is a violation of the statutory duty outlined in the Islands (Scotland) Act 2018, while the failure to present a full Social Impact Assessment represents a significant omission. These shortcomings impede the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

The proposal contradicts the principles of National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage, fails to ensure that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit as a result of missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments relating to marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential threshold necessary to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, which activates the precautionary principle, thus preventing any lawful determination that impacts are acceptable.

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

Overall, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority is therefore urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to require the submission of the necessary 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 totally oppose the proposed development of spiorad na mara, growing up in Bhaltoas was invaluable. We were taught our traditional language Gaidhlig, crofting and to be self sufficient using sustainable practices. We often don't appreciate the beauty, peace and

strong community living in our younger years, but we certainly do in our mid to later years!

The land and sea scape on the west coast of Lewis is largely unspoiled with an abundance of wildlife attracting large numbers of visitors. Fishing was a huge industry many years ago and still is to a lesser extent, however locals still fish for their own consumption.

Tourism brings a lot of income to the local economy on the island due to its natural beauty and wildlife.

I believe that this project will negatively impact the way of life on the west coast of Lewis by changing the land and seascape, will impact marine wildlife through noise and light pollution and make it a less attractive destination for visitors.

I don't believe that this proposal will generate a lot of local employment, most of the employees will be sourced from the mainland with only a maintenance crew based on the island post construction.

I believe the cost financially and environmentally is not viable.

Please preserve the natural beauty and environment of our Western Isles.

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: 86C90D0F

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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 frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The development is proposed off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural heritage. The design, scale, and proximity of the proposal raise serious concerns about its alignment with statutory obligations, national policy, and sustainable development principles.

The application does not establish an adequate evidential basis for a lawful decision. Critical environmental data is absent, baseline information is insufficient and inconsistent, and essential elements of the proposal remain unclear. The application employs a flexible design framework, which obscures a clear understanding of potentially significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

There are evident and 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 landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate compliance with national obligations to protect biodiversity, climate considerations, and environmental integrity. These discrepancies directly affect the statutory requirements for consent and impede the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shore, raises significant issues regarding landscape capacity, visual impact, and environmental ramifications. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance illustrates that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail and transparency to reliably account for the potential environmental effects of the proposal. The flexibility allowed by the Project Design Envelope, which does not commit to specific turbine dimensions or layouts, introduces considerable uncertainty. This creates challenges in applying a worst-case scenario consistently, thereby undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent what will ultimately be constructed, leaving both the public and the competent authority unable to understand the true extent of the environmental effects.

Furthermore, the application is overly reliant on mitigation measures, monitoring strategies, and management plans that have not yet been established. Seeking consent based on the assumption that environmental harm will be managed later does not allow for a proper evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information until post-consent stages is procedurally unacceptable and contradicts the intended purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies must be clearly identified before any determination is made.

Additionally, there are serious evidential deficiencies present, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the assessment concludes that effects are negligible or non-significant without robust supporting data. The lack of adequate information hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also does not comply with National Planning Framework 4, which includes obligations related to biodiversity protection and environmental integrity, as it cannot be demonstrated that the impacts have been fully assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, preventing the competent authority from making a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application fails to adhere to the established mitigation hierarchy, resulting in an inadequate demonstration that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This deficiency hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be

concluded that the proposal represents a sustainable or policy-compliant solution.

There is a lack of transparent and evidence-based evaluation concerning alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has adequately considered the option of situating turbines further offshore, where potential visual, ecological, and coastal impacts would likely be mitigated. The West Lewis coastline is highly sensitive, and proximity to shore plays a crucial role in determining impact; thus, the absence of such analysis undermines any assertion that the proposed siting is the least damaging option.

Furthermore, the evaluation of cable routing and landfall assessment reveals insufficient evidence that alternative routes have been thoroughly examined to prevent or lessen impacts on sensitive receptors, including culturally significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance, coupled with a lack of comparative analysis, suggests that mitigation by design has not been appropriately applied, leading instead to an over-reliance on post-design mitigation measures.

From a policy standpoint, these shortcomings significantly undermine adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and the wellbeing of communities. The absence of a structured, comparative assessment represents a material omission that contributes to the overarching conclusion that the application has not undergone adequate scrutiny and cannot support a lawful determination. The assessment of alternatives is materially inadequate and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured, reasoned comparison of realistic alternatives based on environmental effects, the application presents a narrative account of project evolution, failing to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

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 raises significant concerns regarding the reliability of the ornithological assessment, which is riddled with substantial gaps in evidence and internal contradictions that fundamentally undermine its conclusions. The site is situated on the west coast of the Isle of Lewis, an area known to support internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate, to the requisite evidential standard, that these species will remain unaffected. Key foraging areas and migratory pathways are located within the development site, yet the assessment fails to thoroughly evaluate the implications of habitat loss, collision risk, and displacement.

Moreover, a critical inconsistency is evident in the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment, suggesting that its conclusions are not substantiated by the evidence provided. The assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully acknowledged, and reliance on modelling methods

introduces further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially where baseline data is incomplete and the behavioural responses of the birds remain poorly understood.

Placing turbines within a recognised migratory corridor adds another layer of significant risk, potentially creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The application inadequately considers the long-term consequences of ongoing mortality in this corridor, along with the potential impact on species with relatively small global populations.

Regulatory compliance is also called into question, as the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside 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, impeding any lawful conclusions that could support consent.

The identified deficiencies also demonstrate a lack of compliance with National Planning Framework 4, particularly concerning biodiversity protection and the conservation of natural assets. The inability to convincingly show that internationally significant seabird populations will not be adversely affected positions the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistencies, methodological flaws, and inadequate evidence. These issues hinder a thorough evaluation of potential impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for a favourable decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated inadequately. These sites remain active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to consider how development impacts their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Moreover, the application neglects to assess intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between

the community and the coastal environment. These vital elements form the identity of the area but are absent from the assessment, highlighting a significant omission. Without addressing these factors, the cultural impact of the proposed development cannot be fully understood.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents, yet the complete report has not been made public. This situation creates a significant evidential gap that hinders both the public and the competent authority from fully understanding the social risks identified through the developer's own research. Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are therefore based on real experiences rather than speculation. However, without access to the full assessment, proper scrutiny of these findings is not possible, limiting the ability to gauge their significance in the decision-making process.

Additionally, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted within the developer's own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or given the weight they deserve. The lack of disclosure regarding the complete Social Impact Assessment obscures the true human

and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be at risk. By failing to provide the complete dataset, the application does not offer a thorough evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avoid harm, yet the evidence currently available indicates adverse effects that have not been fully disclosed. Consequently, it cannot be established that compliance with this policy is met in the absence of the full assessment.

The procedural implications are significant, as the competent authority is unable to conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a material omission within the application and a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This shortcoming prevents a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shoreline would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a permanent and irreversible alteration of the landscape. The assessment of the seascape, landscape, and visual impacts associated with this proposal is materially deficient, failing to adequately represent the extent of this visual change.

The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly impact visual amenity and diminish the essential qualities of naturalness and remoteness. However, the application does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

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

magnitude of visual impact has been understated, consequently undermining the reliability of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

Particularly troubling is the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil

spills, it fails to provide sufficient detail on prevention, control, or monitoring strategies.

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

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

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

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

FISHERIES AND MARINE LIFE

The 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 assessment of the proposed development lacks completeness, particularly regarding onshore infrastructure, which is crucial to understanding the impacts of this single integrated project. The offshore turbines and the onshore works are closely interconnected, yet they are treated as separate entities in the assessment process. This fragmented approach obscures the true scale of both environmental and socio-economic effects that arise from the project.

Onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. This construction involves excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and an ecologically sensitive habitat. The lack of a comprehensive assessment regarding these impacts means the overall environmental footprint of the project cannot be fully understood.

By deferring or excluding 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 components of a project be considered together. The division of offshore and onshore elements results in a lack of understanding of the combined impacts on peatlands, habitats, and local communities.

Furthermore, there are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The proposal does not sufficiently demonstrate that the impacts on these habitats have been adequately assessed or that effective avoidance measures have been implemented. This indicates a significant gap in evidence concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy initiatives. The application falls short in addressing this concern or in proving that the overall carbon balance remains positive.

The routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is a lack of evidence to confirm that necessary consents or processes have been initiated, which casts doubt on the project's deliverability and legality.

From a policy perspective, the failure to assess the project as a cohesive entity and to show that peatlands, habitats, and land use interests are protected is in direct conflict with the National Marine Plan and the National Planning Framework 4. Moreover, 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 regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission in the Environmental Impact Assessment. The coastline of West Lewis features exceptionally dark skies that contribute to environmental quality, cultural identity, and tourism. However, the proposal introduces permanent red aviation lighting that would create a continuous and intrusive light effect across the western horizon, fundamentally changing the night-time environment.

There is no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important as dark skies play a critical role in the area's identity and the growth of sectors like astrotourism. The absence of this analysis creates a clear gap in the overall landscape and environmental assessment.

Moreover, impacts on nocturnal wildlife have not been evaluated. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can lead to disorientation and increased risk of collision. The application fails to include any assessment of lighting impacts or

phototaxis studies, meaning the potential effects on these species and the risk of increased mortality remain unexamined.

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

Without an assessment of nocturnal impacts, it is impossible to determine whether protected species or designated sites would face adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be fulfilled, which invokes the precautionary principle and impedes a lawful determination.

From a policy standpoint, this omission goes against National Planning Framework 4 concerning the protection of natural places and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time is an essential part of the environment.

Overall, 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 makes the application incomplete and unsuitable for lawful determination.

TOURISM

The assessment regarding the impacts on tourism is significantly lacking and does not adequately evaluate the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly unspoiled landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantifiable assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application does not model the effects that the industrialisation of the seascape and the degradation of environmental quality would have on Tourism Gross Value Added or broader economic resilience. In the absence of such an analysis, it remains unclear whether the development would generate a net economic benefit or detract from an already established and expanding sector.

Moreover, the assessment neglects to account for the critical role that environmental quality plays in tourism, including the significance of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this

shortcoming, leaving a substantial gap in the understanding of the impacts on a recognised and growing segment of the local economy.

Considering the context of an island community with limited economic diversification, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been scrutinised as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

In summary, the shortcomings in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency lead to a significant evidential gap. This hinders a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development when considered against national policy, statutory duties, and evidential standards. This application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008. At that time, the level of industrialisation was deemed unacceptable. Now, the application is being assessed under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidence provided for this application. It lacks a comprehensive and reliable evidential basis for determination. Notable gaps in baseline data exist, and the use of an undefined design envelope is concerning. Furthermore, the reliance on unspecified mitigation measures and the omission of critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, leave the Environmental Impact Assessment incomplete. This inadequacy hampers a full understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts the objectives set out in National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage. Furthermore, it fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The necessary evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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, disruptions to cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be mitigated to an acceptable level.

In summary, the application is procedurally and substantively unsuitable for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the relevant regulatory provisions to request the missing information.

Therefore, it is formally requested that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

Additional Comments

I am writing to formally object to the proposed Spiorad na Mara (N4) offshore wind development.

While I recognise the importance of transitioning to renewable energy, I strongly believe this project is not appropriate for this location. The scale and proximity of the development raise serious concerns about its impact on our environment, landscape, and local communities.

The proposed turbines, up to 338 metres in height, would fundamentally alter the character of our coastal and island views, which are widely valued for their natural beauty, cultural significance, and sense of openness. A development of this magnitude, with turbines as close as 6km from shore, risks industrialising a seascape that has remained largely unspoilt.

I am also deeply concerned about the potential effects on marine ecosystems. These waters support a rich diversity of wildlife, and the construction and operation of such a large-scale project could have lasting and potentially irreversible impacts on marine species and habitats.

In addition, the wellbeing of local communities must be carefully considered. The visual impact, along with potential noise, disruption, and long-term changes to the character of the area, could negatively affect quality of life and the local economy, including tourism.

Renewable energy development must be balanced with environmental protection and respect for communities. In this case, I do not believe that balance has been achieved. For these reasons, I urge that this application be refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8850AE14

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 deficiencies within the Environmental Impact Assessment Report are substantial and undermine its reliability, as it fails to provide a full and transparent account of the potential environmental effects associated with the proposal. The introduction of a

flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, leads to considerable uncertainty. This uncertainty hinders the application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately reflect the actual development constructed, limiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed subsequently, which obstructs meaningful evaluation of the effectiveness of these measures and precludes proper assessment of residual impacts. Such deferral of essential information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established before any determination is made.

Additionally, the report is marred by significant evidential deficiencies, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These shortcomings generate uncertainty regarding the scale and significance of impacts, especially in instances where negligible or non-significant effects are posited without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

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

In summary, the combination of an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and robust evaluation of environmental effects, placing the competent authority in a position where it cannot make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is characterised by a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is significantly deficient. There is an incomplete understanding of ecological receptors within this area, primarily due to inadequate baseline data and ineffective

methodologies that fail to accurately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The proposal involves the development of turbines within a crucial migratory corridor on the west coast of the Isle of Lewis, an area that supports internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is fundamentally flawed, containing significant gaps in evidence and internal inconsistencies that call its conclusions into question. The assessment fails to robustly evaluate critical aspects such as

displacement, collision risk, and habitat loss, despite the fact that these seabird species are known to rely on key foraging areas and migratory pathways.

There exists a stark contradiction within the application itself. The developer asserts that there will be no significant adverse effects, yet simultaneously puts forth a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and raises serious doubts about the sufficiency of the evidence presented. Furthermore, the assessment does not adequately demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not fully recognised, and the methodologies used, which rely on modelling approaches, introduce uncertainty, particularly for species like Kittiwakes and Fulmars that are already experiencing severe population declines.

The implications of sustained mortality within this migratory corridor are not sufficiently addressed, nor are the potential consequences for species with relatively small global populations. From a regulatory standpoint, the application falls short of the evidential threshold needed to confirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and methodological limitations, means that the standard of beyond reasonable scientific doubt has not been met, thus engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

Moreover, these deficiencies represent a failure to comply with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that these internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these factors render the assessment unreliable, due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the proposed impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is critically flawed and lacks the necessary transparency for a legally sound assessment. Although the developer undertook a Social Impact Assessment that included focus groups with local residents, the comprehensive report remains unpublished. This lack of availability creates a significant evidential gap, inhibiting both public scrutiny and the competent authority's understanding of the full range of social risks identified in the developer's research.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct community engagement and are therefore grounded in reality, not conjecture. Nevertheless, the absence of the full assessment restricts

proper examination of these findings and hampers the determination of their relevance in the decision-making framework.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings noting "cultural loss." Despite this, such impacts have not been adequately incorporated into the main application nor afforded the appropriate consideration. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health implications is essential for projects of this magnitude, especially where community identity and functionality may be at risk. The failure to provide the complete data set undermines the application, leaving it without a robust evidential foundation for evaluating the balance between benefits and detriments.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the evidence currently available suggests the existence of adverse effects that have not been fully acknowledged. Without the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a significant omission in the application and signifies a failure to satisfy the evidential obligations of the Environmental Impact Assessment framework.

In conclusion, the combination of the non-disclosure of the complete Social Impact Assessment and the evidence of existing adverse impacts leads to an incomplete and unreliable evaluation. This scenario precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts, seascape, and landscape is significantly lacking and does not adequately capture the extent of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic views, undeveloped nature, and pronounced sense of remoteness. The proposed installation of large turbines near the shore would introduce a persistent and overwhelming industrial presence, fundamentally changing this character and resulting in an irreversible alteration of the landscape.

Concerns arise regarding the magnitude of visual change conveyed by the application. The scale and location of the turbines mean they would dominate the views from

residential areas, historic sites, and popular coastal locations. Such dominance would adversely affect visual amenity and diminish the defining features of naturalness and remoteness. The assessment fails to adequately reflect the significance of this impact within the context of such a sensitive landscape.

Methodological issues concerning the choice and presentation of visual viewpoints have also been identified. Evidence indicates that these viewpoints may not adequately portray the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the scale of visual impact has been understated, compromising the assessment's reliability.

Another critical oversight is the lack of consideration for the interconnected nature of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a larger landscape context, linked by visual and spatial relationships to the Atlantic horizon. By treating these heritage assets as isolated entities, the assessment fails to recognise their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This represents not just a visual impact but a broader cultural and spatial detriment that the application has not adequately assessed.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, particularly regarding the safeguarding of natural environments and historic sites. The level of change proposed is inconsistent with the necessity to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a thorough worst-case assessment further diminishes any assertions of policy adherence.

Additionally, it is evident that the identified impacts are not amenable to effective mitigation. The scale, height, and proximity of the turbines would result in a presence that is dominant and inescapable. Consequently, the resulting changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately depict the extent of impact, the environment's sensitivity, or the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a comprehensive assessment of construction and pollution risks, which is critical for understanding the likely environmental effects. It involves significant seabed preparation and installation activities in a high-energy Atlantic

environment, but there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that are to be prepared after consent is granted, hindering a meaningful evaluation of their adequacy and effectiveness.

This reliance on unspecified future measures raises serious concerns, especially considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide sufficient information on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without robust modelling and well-defined management strategies, the potential extent, duration, and ecological impacts of these plumes cannot be determined. This uncertainty also extends to the effects on marine species and habitats, which have already been identified as sensitive in the wider assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether adequate safeguards are in place to address potential pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards goes against the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before consent can be granted. The absence of this critical information means that a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These deficiencies impede 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 proposal is flawed and does not adequately assess the impacts on marine life and fisheries. The waters off the West Lewis coast are home to a diverse ecosystem and a thriving fishing industry. However, the application does not convincingly show that these important habitats and activities can be preserved without significant harm.

One major concern is the assumption that fishing can be easily displaced without negative consequences. The application does not provide any evidence that alternative fishing grounds are available or can support the increased pressure that displacement would cause. This is a critical oversight, as it risks overfishing in other areas and could have broader economic implications for local fishermen. Without a detailed and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Additionally, the proposal poses considerable risks to marine species, particularly due to noise created during construction. The use of high-energy hammer piling for an extended duration is likely to disrupt marine life across extensive areas, particularly affecting dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is a serious concern, yet the application minimizes these impacts without adequate justification.

There is also a contradiction within the application regarding the need for licenses for harming European Protected Species, while simultaneously claiming that the impacts are negligible. This inconsistency undermines the trustworthiness of the assessment and raises questions about adherence to the Habitats Regulations, especially since harm appears to be expected to a level that requires legal approval.

Moreover, the assessment does not address the cumulative impacts from various 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 economic conditions remains uncertain.

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not prove that the development can coexist with current marine users or prevent unacceptable impacts on marine biodiversity. This lack of compliance hampers any assertion that the proposal supports sustainable development.

In summary, the shortcomings in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions all contribute to an incomplete and unreliable assessment. These issues inhibit a thorough understanding of the potential effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not account for the full impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interdependent but are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore activities include cabling across protected moorland, construction of a substation near Stornoway, and access infrastructure through sensitive landscapes.

These activities involve excavation in deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By not assessing onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully clear.

There are significant risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been taken. This creates a gap in evidence regarding biodiversity protection.

The proposal also raises issues related to 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 concern or prove that the overall carbon balance remains positive.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been started, raising concerns about the project's deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project as a whole and to show protection 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 project components, lack of thorough assessment, and absence of evidence on environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful decision.

TOURISM

The application acknowledges that 86% of visitors are attracted by the area's scenery. However, it fails to provide a quantified analysis of how large-scale offshore infrastructure could potentially affect visitor numbers, their behaviour, or the overall economic contribution of tourism, which is a key sector of the Isle of Lewis economy. Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Despite this, the application does not model the potential impact of industrialising the seascape or the loss of environmental quality on Tourism Gross Value Added or the broader economic resilience of the community.

The assessment neglects to address the crucial role that environmental quality plays in supporting tourism. The significance of unspoiled landscapes and dark skies cannot be overstated, especially in relation to visitor experience and emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on these important aspects of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly concerning economic impact and the obligation to provide evidence of net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for competent authorities to assess the economic consequences of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the island's economic dependency creates a significant evidential gap. This 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 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

It has been proven that these windmill breaking systems contain ASBESTOS surely this should be enough to ban them altogether.
I Recently lost my mother due to cancer caused by ASBESTOS.

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: 65416CA2

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 marine licensing and Environmental Impact Assessment frameworks. It arises from an examination of the Environmental Impact Assessment Report and accompanying documents, revealing significant shortcomings in planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the western side of the Isle of Lewis, an area noted for its Atlantic-facing coast, near-pristine surroundings, and strong cultural significance. Concerns regarding the scale, proximity, and design of the project fundamentally challenge its adherence to statutory obligations, national policies, and sustainable development principles.

The application lacks an adequate evidential basis for a lawful determination. There are gaps in critical environmental data, with baseline information being both limited and inconsistent, while vital elements of the proposal remain undefined. The application's flexible design framework obscures a clear assessment of likely significant effects, and the reliance on unspecified mitigation measures renders their efficacy unassessable. Consequently, the documentation fails to provide a thorough understanding of potential environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust support.

The proposal also presents clear and serious conflicts with policy. It appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and community health and wellbeing. It does not convincingly demonstrate compliance with national mandates for protecting biodiversity, climate considerations, and overall environmental integrity. These discrepancies challenge the statutory requirements necessary for consent and hinder the competent authority's capacity to determine the development's policy acceptability.

Moreover, the proposal's scale is unprecedented for this area, with large turbines planned in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual impact, and environmental consequences. The combination of inadequate information, reliance on undefined mitigation strategies, evidential deficiencies, and evident policy non-compliance renders the application incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary detail to adequately account for the potential environmental effects of the proposal. A flexible Project Design Envelope is used, which does not specify turbine dimensions, layouts, or configurations. This creates uncertainty and makes it difficult to apply a worst-case scenario consistently. As a result, the assessment may not accurately reflect the impacts of the final development, leaving both the public and the competent authority unaware of the true environmental consequences.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that have yet to be defined. This means that consent is being sought under the assumption that environmental harm will be addressed after approval, hindering any meaningful evaluation of these measures or the assessment of residual impacts. Such a deferral of important information to post-consent stages is not acceptable and contradicts the purpose of the Environmental Impact Assessment regime, which requires the establishment of likely significant effects and mitigation before a decision is made.

There are also notable evidential shortcomings, including missing baseline data, methodological limitations, and the use of assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant conclusions are drawn without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not fulfil the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns related to the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to meet the standards set by National Planning Framework 4, especially those related to biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that proper safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specific mitigation, and gaps in baseline data leads to an unreliable and incomplete Environmental Impact Assessment Report. These issues hinder a lawful and thorough assessment of environmental effects, meaning the competent authority cannot make an informed decision based on the provided information.

ORNITHOLOGY AND SEABIRD IMPACTS

The application raises significant concerns regarding its compliance with established evidential standards, particularly in relation to the integrity of protected sites. The ornithological assessment reveals internal inconsistencies and substantial gaps in evidence that critically undermine its conclusions. Despite the west coast of the Isle of Lewis hosting internationally important seabird populations, which are already experiencing declines, the application fails to adequately demonstrate that these

species will not face adverse impacts. It is particularly troubling that the development is situated within vital foraging areas and migratory pathways, yet the assessment does not thoroughly evaluate the potential risks associated with displacement, collision, or habitat loss.

A serious contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously making a case for Habitats Regulations derogation—a process only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment, suggesting that the conclusions presented lack robust support from the evidence provided. Furthermore, there is insufficient proof that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The assessment neglects to fully account for the importance of these feeding grounds, and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, especially in instances where baseline data is lacking and species behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor poses an additional risk, potentially creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term consequences of ongoing mortality within this corridor or its potential effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to determine that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This activates the precautionary principle, thereby hindering a lawful conclusion in favour of consent.

Additionally, the deficiencies noted signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not suffer adverse effects positions the proposal in direct contradiction to national policy.

Overall, the unreliability of the assessment stems from its internal contradictions, methodological shortcomings, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and culminate in 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 fundamentally insufficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The

application adopts a simplified viewpoint, treating heritage as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

One significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices, yet they are mischaracterised as static features. The assessment fails to acknowledge their continued use and meaning, as well as the development's potential impact on their setting. This oversight results in an inadequate evaluation of cultural effects and disregards their importance within community life.

Additionally, the application neglects the intangible aspects of cultural heritage, which include the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These factors are vital to the area's identity but are entirely omitted from the assessment, creating a significant gap. Without considering these elements, the cultural impact of the development cannot be adequately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which possesses a unique cultural identity and recognised characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement undermines the validity of the assessment and fails to align with established principles of participation concerning decisions that affect cultural and environmental interests.

Moreover, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot fulfil its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders a lawful determination impossible.

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

In summary, the shortcomings in evaluating living heritage, intangible cultural values, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the proposed development have not been adequately assessed, and the application lacks a sound basis for determining the true cultural costs associated with it.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal involves the installation of large-scale turbines near the West Lewis coastline, which is characterised by its open Atlantic horizon and undeveloped nature. This change would create a continuous industrial presence that fundamentally

transforms the area, leading to a permanent alteration of the landscape. The assessment of seascape, landscape, and visual impacts associated with this development is significantly lacking, failing to adequately reflect the magnitude of change and the sensitivity of the local environment.

The scale and proximity of the turbines would lead to their dominance in views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the naturalness and sense of remoteness that define the region. Furthermore, the assessment does not adequately communicate the significance of these impacts in a landscape that is already sensitive.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that some viewpoints do not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, which calls into question the reliability of the assessment.

Another critical shortcoming is the failure to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, tied together through visual and spatial relationships with the Atlantic horizon. The assessment wrongly treats these assets as isolated, leading to an incomplete understanding of the potential impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and affecting their connection to the natural environment. This presents not merely a visual concern but also a broader cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4 by failing to protect natural places and historic assets. The scale of proposed changes does not align with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case impact 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 would render their presence unavoidable and dominant. Consequently, the transformation of the landscape would be fundamental and permanent, rather than capable of being reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately convey the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and underscore the conclusion that the proposal is at odds with the necessary protection of this significant landscape.

TOURISM

The assessment of tourism impacts associated with the proposed development is seriously lacking and does not adequately evaluate the economic and social implications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide any quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism on the Isle of Lewis has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not consider how the industrialisation of the seascape and the resultant loss of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. Without such critical analysis, it remains uncertain whether the development would yield a net economic benefit or adversely affect an established and expanding sector.

The lack of consideration for the role of environmental quality in fostering tourism is a glaring omission, particularly the significance of unspoiled landscapes and dark skies to visitor experience and emerging markets like nature-based tourism and astro-tourism. Furthermore, the absence of a Dark Skies Assessment exacerbates this shortcoming, leaving a considerable void in understanding the potential impacts on a recognised and burgeoning segment of the local economy.

In light of the island community's limited economic diversification, the neglect of tourism impact assessments carries broader implications for employment, local businesses, and the sustainability of the community. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not illustrate compliance with the National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks sufficient evidence for the competent authority to properly assess the economic consequences of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and consider the island's economic dependency results in a significant evidential gap. This deficiency hampers a comprehensive evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal demonstrates a profound failure to comply with the principles of sustainable development as mandated by statutory

duties, national policy, and evidential standards. This application revisits core issues that previously led to the refusal of the Lewis Wind Power proposal in 2008, when the extent of industrialisation was deemed unacceptable. Notably, it is now presented within a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are critical deficiencies in the evidential basis necessary for determination. The application fails to present complete baseline data and continues to rely on an undefined design envelope. Furthermore, it depends on unspecified mitigation measures and neglects significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the entire Social Impact Assessment is a material omission. These flaws obstruct 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 adequately protect biodiversity, natural environments, or cultural heritage. It fails to demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, which obscures their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion that impacts are acceptable.

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

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

information.

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

Additional Comments

This Island is part of the Outer Hebrides and has its own unique identity and landscape with a way of life that is (and will continue to be) different from any other island and the mainland.

This mass industrialisation to capture the power of wind and transmit elsewhere needs to be halted and looked at again. There has been no progress in the development of the technology that is currently being used at the expense of communities. The voices of communities up and down the island have been silenced by the greed of others - money talks!

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: AEE7B123

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. It is informed by a thorough review of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal raises serious concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application is deficient in providing an adequate evidential basis for a lawful determination. It lacks critical environmental data, presents limited and inconsistent baseline information, and leaves key aspects of the proposal undefined. The employment of a flexible design framework obscures understanding of potential significant effects, while the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive or informed assessment of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Furthermore, the proposal presents clear and substantial conflicts with existing policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, undermining the ability of the competent authority to determine the acceptability of the development from a policy perspective.

The scale of the proposal is unprecedented for this area, with large turbines proposed in close proximity to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the likely 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 substantial uncertainty. This lack of specificity impedes a consistent worst-case scenario application, thereby compromising the integrity of the assessment. Consequently, the impacts reported may not accurately represent the eventual development, limiting both public understanding and that of the competent authority concerning the true extent of environmental effects.

Furthermore, the application hinges on undefined mitigation measures, monitoring strategies, and management plans, which are not yet established. Seeking consent under the premise that environmental harm will be addressed later hinders a meaningful evaluation of their effectiveness and assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, contradicting the aims of the Environmental Impact Assessment regime that necessitates clear establishment of likely significant effects and mitigation prior to determination.

There are considerable evidential gaps, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These shortcomings result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effect conclusions lack robust supporting data. The failure to provide adequate information hampers 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 set by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been thoroughly assessed or if appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application significantly lacks a structured and evidence-based assessment of alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of offering a clear and reasoned comparison of viable alternatives based on their environmental effects, it provides a narrative that merely recounts the project's development. This failure to adequately explore and identify less

harmful options means that more damaging solutions may have been improperly prioritised.

Furthermore, there is a notable absence of a transparent comparison of different offshore locations, scales of development, or design configurations. The application does not convincingly demonstrate that the developer has seriously considered placing turbines further offshore, an approach that would likely mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, the lack of analysis on this aspect raises serious concerns about the proposed siting's validity as the least damaging option.

The shortcomings are also evident in the analysis of cable routing and landfall assessments. There is insufficient evidence provided to indicate that alternative routes have been thoroughly investigated to minimise impacts on sensitive receptors, including culturally significant areas such as Barvas Cemetery. The absence of a clear strategy to avoid such impacts, coupled with a lack of comparative analysis, suggests that the design has not incorporated mitigation measures effectively, relying instead on post-design measures that may not sufficiently address the concerns.

Consequently, the application does not demonstrate that environmental harm has been adequately minimised through careful site selection, infrastructure routing, and layout. This oversight represents a failure to adhere to the established mitigation hierarchy, which is essential for ensuring that less harmful and more suitable alternatives are properly evaluated. The absence of a rigorous assessment of alternatives raises doubts about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies impede compliance with National Planning Framework 4, particularly regarding the preservation of natural environments, cultural heritage, and the well-being of local communities. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete understanding of ecological receptors within the West Lewis coastal environment, which is a sensitive and biologically active marine system. The baseline data is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, this lack of comprehensive data undermines the assessment's reliability for evaluating potential impacts.

A significant oversight is the inadequate recognition and assessment of otters, which are a European Protected Species. The application does not properly address their active use of coastal areas for foraging and movement. This omission means that the potential effects of construction disturbances, noise, and increased human activity

have not been sufficiently evaluated, thereby questioning the conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks is flawed due to a reliance on aerial surveys, which introduce significant detection bias, particularly in Atlantic conditions. This methodology is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to consider such critical data results in an incomplete baseline and detracts from the reliability of the conclusions presented.

The methodological shortcomings lead to assertions of negligible or non-significant effects based on assumptions rather than robust evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This contributes to uncertainty regarding the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainties introduced prevent the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the application of the precautionary principle. Given these conditions, lawful consent cannot be granted.

In summary, the assessment's reliance on incomplete baseline data, flawed methodologies, and unsupported conclusions renders it unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a solid evidential foundation.

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 proposed development fails to adequately assess cultural heritage and community identity, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. The application adopts a narrow perspective, viewing heritage merely as a collection of isolated and static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

A primary shortcoming is the treatment of culturally significant locations, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places for burial and spiritual practice; however, the assessment misclassifies them as static features, overlooking their ongoing use and meaning, as well as the implications of development on their surroundings. This mischaracterisation results in an incomplete analysis of cultural effects and neglects their vital role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language and the community's enduring relationship with the coastal environment. These components are integral to the area's identity yet are entirely omitted from the assessment, which constitutes a significant gap. A proper

understanding of the cultural impact of the development is unattainable without these considerations.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinctive cultural identity, recognised as characteristic of an Indigenous People, but the process of Free, Prior and Informed Consent has not been undertaken. This lack of meaningful engagement undermines the validity of the assessment and does not align with established principles for participation in decisions impacting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to 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 deficiencies position the proposal in direct opposition to National Planning Framework 4, particularly regarding the preservation of historic assets and locations. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly diverges from policy requirements.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application does not offer a solid foundation for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment regarding social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This situation creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full extent of social risks highlighted in the developer's own research.

Summaries available suggest that 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 merely speculative. Nevertheless, the absence of the complete assessment obstructs proper scrutiny of the findings and diminishes the capacity to assess their significance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Yet, these impacts have not been adequately incorporated into the main application or given the

appropriate consideration they warrant. The failure to disclose the full Social Impact Assessment thus conceals 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 where community character and functioning are at stake. By withholding the full dataset, the application does not provide a comprehensive evidential foundation for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must promote positive health outcomes and avoid harm; however, the evidence available points to existing adverse effects that remain undisclosed. Without the complete assessment, compliance with this policy cannot be established.

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 constitutes a material omission within the application and indicates a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

In summary, the failure to release the full Social Impact Assessment, coupled with evidence of current adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and strengthens the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

A critical oversight is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting linked to the Atlantic horizon through visual and spatial relationships. Treating these assets as isolated fails to recognise their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their connection to the natural horizon. This represents a significant cultural and spatial harm that has not been adequately assessed.

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

Finally, the impacts identified in the application cannot be effectively mitigated. Due to the height, scale, and proximity of the turbines, their presence would be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment concerning construction and pollution risks is inadequate and lacks the necessary detail to evaluate the likely environmental effects. This proposal entails significant 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 leans on mitigation and contingency measures that are to be defined after consent has been granted, which hinders any meaningful assessment of their sufficiency or effectiveness.

Particularly alarming is the reliance on vague future measures in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment

mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored.

There is also a lack of clarity concerning the scale and behaviour of sediment plumes that could arise from 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 impacts of these disturbances. This uncertainty also encompasses potential effects on marine species and habitats that have been recognised as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application impedes the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and proposed mitigation prior to granting consent; when such information is absent, a lawful determination cannot occur. Moreover, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life associated with this application presents notable deficiencies that fail to provide a comprehensive understanding of ecological and socio-economic impacts. The waters off the West Lewis coast are known to support a diverse marine ecosystem alongside a thriving fishing industry; however, the proposal lacks adequate evidence to demonstrate that these uses and habitats can be preserved or maintained without significant disruption.

A fundamental concern is the presumption that fishing activities can be displaced without adverse consequences. The application does not substantiate claims that alternative fishing grounds are readily available, accessible, or capable of accommodating additional fishing pressure. This critical gap in the assessment is particularly significant, as displacement could lead to overfishing in alternative areas, thereby imposing broader economic ramifications on the local fishing fleet. Consequently, without a clear, evidence-based analysis, the implications for fisheries and livelihoods remain inadequately understood.

Moreover, the proposal introduces considerable risks to marine species, predominantly due to underwater noise produced during construction activities. The anticipated high-energy hammer piling over a prolonged duration poses the risk of widespread disturbance, potentially impacting species such as dolphins. The projected disruption to a substantial segment of the local bottlenose dolphin population raises serious concerns, yet the application tends to downplay the gravity of these effects without sufficient corroborating evidence.

Furthermore, there exists a notable inconsistency within the application, wherein the necessity for licences to permit harm to European Protected Species is acknowledged. Simultaneously, the application characterises these impacts as negligible. This contradiction undermines the assessment's credibility and raises significant questions regarding compliance with the Habitats Regulations, particularly in cases where anticipated harm necessitates legal authorisation.

The assessment also neglects to account for cumulative impacts resulting from various pressures, such as habitat disruption, noise pollution, and the displacement of fishing activity. In the absence of a thorough evaluation of these combined effects, it remains impossible to determine the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not convincingly demonstrate compliance 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, which hinders any conclusion regarding the proposal's alignment with sustainable development principles.

In summary, the deficiencies concerning evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies culminate in an assessment that is both incomplete and unreliable. These shortcomings obstruct a rigorous evaluation of impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to adequately evaluate the potential impacts of permanent red aviation lighting, which will be visible over long distances and create a pervasive “wall of light” effect across the western horizon. This intrusion will irrevocably change the night-time environment, a crucial aspect of the West Lewis coastline, which is distinguished by its exceptionally dark skies. These dark skies are not only vital for environmental quality but also play an important role in the cultural identity of the area and its burgeoning tourism sector, including astro-tourism.

There is a notable absence of assessment concerning the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant given how critical dark skies are to the

identity of the region. Furthermore, the application does not address the impacts on nocturnal wildlife, which is a severe shortcoming. Nocturnal species, such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, exhibit sensitivity to artificial lighting, with risks of disorientation and increased collision rates. The lack of a lighting impact assessment or phototaxis study means there is no evaluation of how aviation lighting could affect these species or contribute to mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which inadequately captures the nocturnal activity and associated hazards. Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data leaves a substantial gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, which invokes the precautionary principle and obstructs a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural areas and environmental quality. Additionally, it undermines a comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the overall setting.

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

TOURISM

Tourism on the Isle of Lewis has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and represents up to 16% of the island's economy. However, the application does not assess how the proposed large-scale offshore infrastructure could impact tourism, particularly in terms of visitor numbers and economic contributions. It is essential to understand that tourism relies heavily on the area's wild coastline, unspoiled landscapes, dark skies, and a sense of remoteness. Although the application notes that 86% of visitors are attracted by scenery, it fails to provide a quantified analysis of the potential effects on this key sector.

The assessment overlooks the importance of environmental quality for tourism. Unspoiled landscapes and dark skies are vital to visitor experiences, particularly for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impact on this growing part of the local economy.

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

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

In summary, the failure to quantify tourism impacts, evaluate environmental factors affecting visitor behaviour, and address the island's economic dependency leads to a significant evidential gap. This gap prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

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

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

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

The proposal stands in direct opposition to the National Planning Framework 4. It fails to demonstrate adequate protection for biodiversity, natural landscapes, and cultural

heritage, does not prove that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of modelling on tourism impacts. The cumulative effects of both offshore and onshore elements have not been adequately assessed, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

All for green energy but must be conscious of where it is being installed.

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: 6D75A194

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. The proposal has been reviewed in light of the Environmental Impact Assessment Report and associated documents, revealing several material deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and strong cultural identity. Concerns regarding compatibility with statutory requirements and national policy arise from the scale, proximity, and design of the project, challenging the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. Essential environmental data is absent, baseline information is limited and inconsistent, and several key elements of the proposal remain undefined. The flexible design framework used obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, while claims of negligible or non-significant effects lack robust evidence.

There are notable policy conflicts present. The proposal 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 sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts relate directly to the statutory tests necessary for consent and hinder the competent authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal in this area, featuring large turbines placed near the shoreline, raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates 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 inadequate and lacks a full, transparent, and reliable account of the potential environmental effects associated with the proposal. The employment of a flexible Project Design Envelope, which lacks a

commitment to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts presented may not accurately reflect the actual development constructed, which obstructs both the public and the competent authority from comprehending the true extent of the environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application's examination of alternatives is fundamentally insufficient and fails to align with the legal standards outlined by the Environmental Impact Assessment framework. Instead of presenting a coherent and reasoned evaluation of feasible alternatives grounded in their environmental implications, it offers merely a narrative of how the project has evolved. This method does not convincingly establish that less

harmful options have been duly identified, assessed, and chosen over more detrimental solutions.

There is a lack of transparent and evidence-based evaluation concerning alternative offshore sites, varying development scales, or design configurations. Notably, the application does not illustrate that the developer has adequately contemplated placing turbines farther offshore, where the visual, ecological, and coastal repercussions would likely be mitigated. Considering the sensitivity of the West Lewis coastline and the crucial role that distance from shore plays in determining impact, the absence of such analysis hinders any assertion that the proposed location is the least damaging alternative.

These shortcomings also apply to the assessment of cable routing and landfall, where there is inadequate evidence that alternative paths have been thoroughly investigated to prevent or lessen impacts on sensitive areas. This encompasses culturally and spiritually significant locations, such as Barvas Cemetery. The lack of a clear strategy to avoid negative consequences and the deficiency in comparative analysis suggest that the principle of mitigation by design has not been applied, relying instead on measures intended to mitigate after the design phase.

Consequently, the application does not adequately show that environmental damage has been minimised through careful site selection, layout, and routing of infrastructure. This represents a significant deviation from the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it is impossible to assert that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative evaluation is a substantial omission that leads to the overarching conclusion that the application has not undergone sufficient assessment and cannot legitimately support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is fundamentally inadequate, failing to deliver a comprehensive and trustworthy understanding of the ecological receptors present in the West Lewis coastal environment. This area is notably sensitive and biologically active, yet the baseline data remains incomplete, while the methodologies employed are insufficient to capture the presence, behaviour, and habitat utilisation of species within this ecosystem.

A significant gap exists in the consideration of otters, which are classified as a European Protected Species. The application neglects to accurately identify and assess their use of coastal regions for foraging and movement. This oversight of their core foraging range and behavioural tendencies leads to an inadequate evaluation of

potential impacts from construction disturbance, noise, and increased activity. Consequently, the conclusions drawn regarding the lack of significant effects on otters are undermined.

Further shortcomings appear in the evaluation of basking sharks, where reliance on aerial surveys results in a considerable detection bias, particularly in Atlantic conditions. This methodology likely underrepresents their presence, especially when juxtaposed with established land-based observations that show these waters are used frequently by the species. The failure to adequately incorporate or consider such data leads to a flawed baseline and diminishes the reliability of the findings presented.

These methodological shortcomings imply that the conclusions indicating negligible or non-significant effects rely more on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates ambiguity regarding the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as the identification and assessment of protected species remain inadequate. The uncertainty this introduces prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, granting consent would not be legally permissible.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not adequately establish that seabirds associated with protected

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

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

From a regulatory viewpoint, the application fails to meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling weaknesses, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately consider the West Lewis coastline as a living cultural landscape, where environment, language, tradition, and community are interconnected. The application adopts a simplistic view of heritage, treating it merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A significant oversight is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are classified as static features, neglecting their continued use and importance as well as the impact that development may have on their surrounding environment. This mischaracterisation leads to an inadequate assessment of cultural effects and overlooks their vital role in community life.

Moreover, the application does not address intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and

the coastal environment. These elements are essential to the area's identity and are conspicuously missing from the assessment, which constitutes a significant omission. Without acknowledging these factors, the cultural implications of the development remain poorly understood.

Further issues arise concerning community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that is recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Additionally, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means that the competent authority cannot properly fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This single omission prevents a lawful determination.

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

In summary, the lack of assessment concerning living heritage, intangible cultural value, community rights, and statutory responsibilities creates a significant evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application does not offer an adequate basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Moreover, there is a notable perception that the proposal poses a direct threat to community identity and cohesion, with the developer's own findings acknowledging a potential "cultural loss." Despite this, such impacts have not been sufficiently integrated into the main application nor afforded the appropriate consideration. The absence of the complete Social Impact Assessment thus conceals the actual human and social costs of the proposed development.

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

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

The procedural ramifications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential obligations of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon, an undeveloped landscape, and a strong sense of remoteness. The addition of large-scale turbines situated near the shoreline would result in a continuous industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the assessment does not sufficiently convey the extent of this visual change. The size and proximity of the turbines would dominate the views from residential areas, historic sites, and commonly visited coastal locations. Consequently, this would have a direct negative effect on visual amenity and diminish the essential qualities of naturalness and remoteness. The evaluation fails to adequately express this level of impact or its significance within the context of such a sensitive landscape.

Concerns regarding methodology arise from the selection and presentation of visual viewpoints. Evidence indicates that certain viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been understated, thereby compromising the reliability of the assessment.

Additionally, the assessment neglects to consider the interconnectedness of landscape, seascape, and cultural heritage. Significant sites, including the Calanais Standing Stones and other Scheduled Monuments, are situated within a broader landscape context linked through visual and spatial relationships to the Atlantic horizon. By treating these assets in isolation, the assessment fails to recognise their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the experience of heritage assets and severing their connection to the natural horizon. This represents not only a visual impact but also a wider cultural and spatial detriment that has not been sufficiently addressed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The degree of change is at odds with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately represent the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks associated with the proposal is fundamentally lacking in detail, which hinders a proper evaluation of the likely environmental effects. This project entails significant seabed preparation and installation activities within the turbulent conditions of the Atlantic environment. However, it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that will only be formulated after obtaining consent, thereby obstructing any

meaningful assessment of their effectiveness or adequacy.

The reliance on unspecified future measures raises considerable concerns, particularly in light of the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are at risk from sediment disturbances and potential contamination. Although the application acknowledges certain risks, including sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to adequately detail how these risks will be mitigated, controlled, or monitored.

There is also significant uncertainty surrounding the magnitude and behaviour of sediment plumes resulting from the seabed disturbances and cable installations. Without comprehensive modelling and clearly articulated management strategies, it becomes impossible to assess the extent, duration, or ecological repercussions of these impacts. This uncertainty also encompasses the potential effects on marine species and habitats already identified as sensitive within the broader assessment framework.

The lack of comprehensive emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application limits the ability to evaluate whether sufficient safeguards are in place for responding to pollution incidents. This introduces a procedural risk, undermining the competent authority's capability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and associated mitigations prior to granting consent. The absence of this critical information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements regarding environmental protection and water quality.

In summary, the combination of undefined mitigation measures, a lack of detailed management plans, and uncertainty regarding potential impacts creates a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment concerning fisheries and marine life is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The local waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry; however, the application does not convincingly demonstrate how these habitats and activities can be protected or preserved without causing significant disruption.

One major concern is the assumption that fishing activities can be relocated without negative effects. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the added pressure. This gap in the assessment is crucial, as displacing fishing efforts could lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fishing fleet. The lack of a clear, evidence-based assessment hampers the understanding of impacts on fisheries and local livelihoods.

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 extended periods is likely to disturb marine life over large areas, particularly species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises pressing concerns, yet the application minimizes these effects without providing adequate supporting evidence.

The application also presents a contradiction regarding the need for licences to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This inconsistency calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive review of these combined effects, it is impossible to 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 establish that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal constitutes sustainable development.

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies in the application culminate in an incomplete and unreliable assessment. These shortcomings hinder a thorough 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 proposed development introduces permanent red aviation lighting that will be visible over long distances, creating an intrusive "wall of light" effect across the western horizon. This significant alteration of the night-time environment threatens the exceptionally dark skies of the West Lewis coastline, which are essential to the area's environmental quality, cultural identity, and tourism value. The application fails to assess the impacts of this lighting on visual amenity, landscape character, and the experience of residents and visitors, despite the crucial role dark skies play in the region's identity and in emerging sectors such as astro-tourism.

Moreover, there is a complete lack of evaluation regarding the impact on nocturnal

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

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

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

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 Spiorad na Mara Offshore Wind Farm proposal represents significant shortcomings in meeting the principles of sustainable development when evaluated against national policy, statutory obligations, and evidential benchmarks. This application mirrors the main concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, highlighting unacceptable levels of industrialisation. This current proposal is put forth under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

The evidential foundation for the application is incomplete and unreliable. There are notable deficiencies in baseline data, an unclear design envelope, unspecified mitigation measures, and key impact pathways that have not been addressed, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment fails to provide a thorough understanding of potential significant effects or residual impacts.

Procedural errors are also evident. The lack of a compliant Island Communities Impact Assessment violates the statutory requirements set out in the Islands (Scotland) Act 2018, while the omission of a complete Social Impact Assessment is a significant flaw. These gaps hinder the competent authority from evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts with the National Planning Framework 4. It does not adequately ensure the protection of biodiversity, natural sites, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. Additionally, it lacks evidence of a net economic benefit, particularly due to the

absence of tourism impact assessments. The assessment of cumulative impacts from both offshore and onshore components is inadequate, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent. The necessary evidential threshold to affirm the absence of adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and thereby precluding a lawful determination that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is requested that the application for the Spiorad na Mara Offshore Wind Farm be rejected in its entirety.

Additional Comments

I am appalled to hear of this proposal with huge wind turbines on such a beautiful place. No regard for the environment the wildlife or people it affects. We soon will be left with no green space or wildlife - reminiscing to future generations of what used to be and mourning what we allowed to happen to it.
There must be alternatives and this MUST NOT go ahead.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6DB2AD40

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 is informed by a thorough review of the Environmental Impact Assessment Report and accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity.

The unprecedented scale of the proposal introduces large turbines positioned in close proximity to the shoreline, raising substantial concerns regarding landscape capacity, visual impact, and environmental consequences. The application lacks a sufficient evidential foundation necessary for a lawful determination. It is characterised by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The flexible design framework employed results in an inability to fully understand the likely significant effects of the development. Furthermore, the reliance on unspecified mitigation measures means that their potential effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to lack of robust supporting evidence.

The proposal also exhibits clear and substantive conflicts with established policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not adequately demonstrate that it can meet national obligations for the protection of biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

In light of these issues—insufficient information, undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy—the application is deemed incomplete and incapable of supporting a lawful determination. Therefore, the precautionary principle should be invoked in response to these concerns.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report suffers from significant deficiencies, rendering it incomplete and unreliable in its portrayal of the environmental effects

associated with the proposal. A flexible Project Design Envelope is employed, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hampers the ability to apply a worst-case scenario consistently, ultimately undermining the integrity of the assessment. As a result, the impacts presented may not accurately reflect the actual development, denying both the public and the competent authority a comprehensive understanding of the true environmental effects.

Moreover, the application heavily relies on undefined mitigation measures, monitoring strategies, and management plans, which have yet to be clearly articulated. This approach seeks consent on the premise that environmental harm will be addressed in the future, obstructing any meaningful evaluation of the effectiveness or residual impacts of these measures. Such deferral of critical information to post-consent stages is procedurally unacceptable and conflicts with the core aims of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation be clearly established before any determination is made.

Evidential shortcomings further complicate the assessment, with gaps in baseline data, methodological limitations, and reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty surrounding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are reached without robust supporting data. The lack of comprehensive information prevents a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application fails to satisfy the evidential threshold mandated by the Habitats Regulations, thus engaging the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, it does not demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been fully assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic alternatives based on their environmental effects, the application presents a narrative of project evolution. This method does not show 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. Notably, the application does not show that the developer has seriously considered placing turbines further offshore, where visual, ecological, and coastal impacts are likely to be reduced. The West Lewis coastline is sensitive, and the proximity to the shore is crucial in determining impact. The absence of this analysis means it cannot be concluded that the proposed siting is the least damaging option available.

The shortcomings also apply to cable routing and landfall assessment. There is insufficient 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 comparative analysis suggests that mitigation by design has not been effectively implemented, resulting in a reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This indicates a failure to follow the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more appropriate alternatives exist. Without a thorough assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species is fundamentally flawed and fails to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically vibrant marine system, yet it is evident that the baseline data is lacking, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not offer a reliable evidential foundation for evaluating potential impacts.

A significant oversight is evident in relation to otters, classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal zones for foraging and movement. This neglect of their core foraging range and behavioural patterns results in an inadequate assessment of how construction disturbances, noise, and increased activity may affect them. Such omissions undermine any conclusions drawn regarding the absence of significant effects on this species.

Deficiencies are also apparent in the evaluation of basking sharks, where the dependence on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when juxtaposed with well-established land-based observations that indicate regular use of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, further diminishing the reliability of the conclusions drawn.

These methodological shortcomings mean that claims of negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data hampers the meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. As a result, there is uncertainty surrounding the true scale of risk posed to marine species and their 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 protected species have not been properly identified or assessed. The uncertainty this introduces makes it impossible to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies hinder a thorough 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 proposed development presents significant flaws, revealing gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The application fails to demonstrate that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not suffer adverse effects. These seabirds rely on key foraging areas and migratory pathways that the development would disrupt, yet the assessment neglects to thoroughly evaluate the implications of displacement, collision risk, or habitat loss.

A critical contradiction emerges within the application itself. The developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically warranted when significant harm is anticipated. This inconsistency raises serious questions about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks adequate 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 not properly recognised, and reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and

Fulmars. Methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional, serious risk, as it could effectively obstruct a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term effects of sustained mortality in this corridor or the potential impact on species that have relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential standards required to confirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data gaps and modelling limitations, indicates that the threshold 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 reflect 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 directly contradicts national policy.

Overall, the assessment is deemed unreliable due to its internal inconsistencies, methodological shortcomings, and lack of substantial evidence. These deficiencies obstruct a thorough evaluation of the potential impacts and contribute to the conclusion that the application fails to satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, particularly in its treatment of the West Lewis coastline as a living cultural landscape. This area, where environment, language, tradition, and community intertwine, is not adequately acknowledged. Instead, the application adopts a narrow perspective, viewing heritage merely as a collection of static assets while overlooking their dynamic social, cultural, and spiritual significance within the community.

Among the key shortcomings is the inadequate treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment reduces them to mere static features. It fails to appreciate their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and neglects their vital role in community life.

Moreover, the assessment overlooks the importance of intangible cultural heritage, such as the Gaelic language and local traditions, which are essential to the identity of the area. The absence of these elements from the assessment represents a critical gap. Without acknowledging these factors, the true cultural impact of the development remains obscure.

Concerns extend to community rights and engagement, particularly regarding the Gaelic-speaking population, which embodies a distinct cultural identity recognised as Indigenous People. However, there has been no process of Free, Prior and Informed Consent, compromising the credibility of the assessment and failing to adhere to established principles of participation in matters that affect cultural and environmental interests.

A significant procedural failing is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment impedes the competent authority's ability to legally evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these deficiencies position the proposal in direct opposition to National Planning Framework 4, particularly concerning the safeguarding of historic assets and sites. The neglect to consider both tangible and intangible heritage, as well as the living cultural practices, indicates a notable divergence from policy standards.

In summary, the failure to address living heritage, intangible cultural values, community rights, and adherence to statutory obligations results in a significant evidential void. The cultural effects of the proposed development have not been adequately assessed, leaving the application without a robust foundation for understanding the true cultural ramifications.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment commissioned by the developer has created a significant evidential gap. Without access to this crucial report, both the public and the competent authority cannot fully grasp the social risks identified through the developer's own engagement with local residents. Available summaries indicate that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These effects are based on direct feedback rather than speculation; however, the lack of transparency regarding the full assessment inhibits proper scrutiny of the findings and limits the evaluation of their importance in the decision-making process.

Furthermore, the proposal is seen as a potential threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Unfortunately, these impacts have not been sufficiently acknowledged or integrated into the primary application. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This deficiency in transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health consequences is vital for developments of this magnitude, especially when the character and functioning of the community may be at stake. By not providing the complete dataset, the

application fails to offer a comprehensive evidential basis needed to weigh benefits against harm adequately.

From a policy standpoint, the application does not illustrate adherence to National Planning Framework 4 concerning health and wellbeing. Development must foster positive health outcomes while avoiding harm. Yet, the evidence available points to existing adverse effects that remain undisclosed. Consequently, without the full assessment, compliance with this policy cannot be proven.

The implications of this procedural omission 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, representing a material shortfall within the application and a failure to fulfil the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. There is evidence that these viewpoints may not adequately capture the perspectives of the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the assessment underestimates the magnitude of visual impact, compromising its overall reliability.

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

The proposed industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and severing their

connection to the natural horizon. This presents not merely a visual impact but a broader cultural and spatial harm that has not been sufficiently considered in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the lack of a robust worst-case assessment further undermines any assertion of compliance with relevant policies.

Ultimately, the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Thus, the changes to the landscape are fundamental and permanent, rather than something that can be lessened to an acceptable level through mitigation.

In summary, the assessment fails to convey the true scale of impact, the sensitivity of the environment, and the interrelatedness of landscape and heritage. These shortcomings preclude a reliable evaluation and firmly establish that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is significantly lacking in detail, failing to adequately evaluate the potential environmental effects. It involves considerable seabed preparation and installation works in a challenging high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful assessment of their effectiveness or adequacy.

This reliance on vague future measures is alarming, particularly in light of the sensitive receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to detail how these risks will be prevented, managed, or monitored.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a stage after consent, the application obstructs the

ability to evaluate whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and diminishes the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and their mitigation must be evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding 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 create a materially deficient assessment. These failings impede a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

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

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application neglects to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of residents and visitors. This oversight is particularly concerning, as dark skies play a crucial role in the area's identity and in the development of emerging tourism sectors, such as astro-tourism. The omission leads to a clear gap in the overall landscape and environmental assessment.

Furthermore, there is a lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to their phototactic behaviour, which can lead to disorientation and an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not adequately consider how the aviation lighting might affect these species or contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not reflect nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential impact remains unassessed. The lack of site-specific night-time data results in a critical gap in understanding the ecological impacts of the proposal.

Without a thorough assessment of nocturnal impacts, it is impossible to determine

whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and impeding a lawful determination of the application.

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

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

TOURISM

The significant growth of tourism on the Isle of Lewis, which surged from £65 million in 2017 to over £81.5 million, is critical for local employment and the economy. This sector supports more than 1,000 jobs and accounts for up to 16% of the island's economic landscape. However, the application fails to adequately assess the economic and social consequences that large-scale offshore infrastructure would have on this essential aspect of the community.

Despite acknowledging that 86% of visitors are attracted by the area's stunning scenery, there is no quantified assessment of how such infrastructure might influence visitor numbers, behaviour, or the overall economic contributions of tourism. The potential industrialisation of the seascape and the resulting degradation of environmental quality pose a serious risk to the sector's viability. The omission of a thorough evaluation of Tourism Gross Value Added and the broader economic resilience raises significant concerns about whether the proposed development would provide a net benefit or inadvertently harm a vital and thriving sector.

Moreover, the assessment does not address the crucial role that environmental quality plays in attracting tourists, particularly the appeal of unspoiled landscapes and dark skies. This oversight not only neglects the visitor experience but also overlooks burgeoning markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment leaves a critical void in understanding the potential impacts on these growing elements of the local economy.

In an island community with limited economic diversification, the lack of a thorough assessment of tourism impacts has far-reaching implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly evaluated as required under the Islands (Scotland) Act 2018.

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

National Planning Framework 4, particularly regarding economic impact and the need to demonstrate net benefit. It also conflicts with strategic objectives that prioritise tourism as a growth sector, failing to provide sufficient evidence for competent authorities to assess the economic consequences of the proposal.

In summary, the inability to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic dependence creates a significant evidential gap. This gap hinders a robust 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 demonstrates a significant failure to meet the criteria for sustainable development as defined by statutory obligations, national policy, and evidential requirements. The issues central to this application echo those that led to the 2008 rejection of the Lewis Wind Power proposal, where the degree of industrialisation was deemed unacceptable. This current proposal is presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community wellbeing.

The application is lacking a complete and reliable evidential basis for decision-making. There are notable deficiencies in baseline data, the continued utilisation of an undefined design envelope, and an overreliance on unspecified mitigation measures. Moreover, it fails to address key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment is insufficient and does not facilitate a thorough understanding of significant effects or residual impacts.

Procedural inadequacies are also evident. The absence of a compliant Island Communities Impact Assessment is a violation of the statutory duties mandated by the Islands (Scotland) Act 2018, and the non-disclosure of a complete Social Impact Assessment constitutes a critical omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

Additionally, the proposal stands in direct opposition to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage, nor does it prove that impacts on health and wellbeing are acceptable. Furthermore, it lacks evidence of a net economic benefit, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, leaving the implications for peatlands, carbon balance, habitats, and crofting land unclear.

There are considerable uncertainties regarding environmental risks that may be significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt has

not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

Scotland already creates too much energy for the grid to use, we are paying corporate companies millions of pounds to turn off the current wind turbines, pouring money away!

We have such a wealth of animal that will be affected by the introduction of more of these huge monsters, on the land and in the sea.

As a community that has already been abused with the clearances, this is happening all over again, there is no thought to the people who reside here, just the lining of some already rich companies, we as line pockets that have no conscience about the damage they are doing to a people and a way of life.

Why don't the companies use their own land to install these huge turbines instead of raping the land of others.

The damage that will be done to the peat, the release of toxicity will negate the so called green alternative for energy, causing so much pollution to the atmosphere. And after the life of these monsters, they will be left to rot, and continue to contaminate the land and sea in which they are placed, the rich corporations will walk away having raped a land and community, leaving behind a trail of destruction, where again, the indigenous people will have to claw back a life that has been left in tatters, as their livelihood will have been decimated.

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: 5895646C

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection is informed by a review of the Environmental Impact Assessment Report and related documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The site of the proposed development is located 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 application lacks a solid evidential foundation for a lawful determination. Important environmental data is absent, baseline information is inconsistent and limited, and crucial elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures prevents any assessment of their effectiveness. Consequently, the documents do not provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering the claims of negligible or non-significant effects unsupported by adequate evidence.

There are significant policy conflicts present in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and public health. The application does not prove that it can meet national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests needed for consent and weaken the ability of the competent authority to determine that the development complies with policy standards.

The scale of the proposed project is unprecedented for this area, with large turbines planned to be positioned close to the shoreline. This raises serious concerns about landscape capacity, visual dominance, and environmental impacts. The combination of insufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks crucial transparency and fails to provide a comprehensive account of the potential environmental effects of the proposal. The adoption of a flexible Project Design Envelope, which does not commit to

specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This situation hampers the ability to apply a worst-case scenario consistently, compromising the assessment's integrity and obscuring the true environmental impacts. Consequently, both the public and the competent authority are deprived of a clear understanding of the real extent of the proposal's effects.

Additionally, the application places substantial reliance on undefined mitigation measures, monitoring strategies, and management plans. Seeking consent with the intent to address environmental harm at a later stage prevents meaningful evaluation of effectiveness and residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

Moreover, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and an overreliance on assumptions in lieu of site-specific evidence. These issues result in ambiguity concerning the scale and significance of impacts, particularly where conclusions regarding negligible or non-significant effects lack robust supporting data. The insufficient information available hampers a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not comply with statutory requirements.

As a result, the application does not fulfil the evidential standards mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate alignment 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 an undefined design envelope, lack of specific mitigation measures, and significant gaps in baseline data undermines the reliability and completeness of the Environmental Impact Assessment Report. These shortcomings prevent a lawful and rigorous evaluation of environmental effects and indicate that the competent authority lacks sufficient information to make a determination on the application.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate, lacking a thorough and dependable understanding of the ecological receptors present in this sensitive marine area. The baseline data is insufficient, and the methodologies employed do not effectively capture the presence, behaviours, and habitat utilisation of various species. Consequently, the assessment fails to establish a credible evidential basis for understanding potential impacts.

Particularly concerning is the oversight regarding otters, classified as a European Protected Species. The application does not appropriately acknowledge or assess their active usage of coastal regions for foraging and movement. This oversight neglects critical factors such as their core foraging range and behavioural patterns, leading to an inadequate assessment of the potential impacts stemming from construction activities, noise, and increased human activity. Such gaps significantly undermine any assertions regarding the lack of significant effects on this species.

Additionally, the assessment of basking sharks suffers from deficiencies, primarily due to an over-reliance on aerial surveys that introduce substantial detection bias, especially under Atlantic conditions. This methodological approach is likely to underreport the presence of these sharks, particularly when compared to established land-based observations that indicate their frequent utilisation of these waters. The failure to integrate or properly consider such data culminates in an incomplete baseline, thus diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in findings of negligible or non-significant effects being based on conjectures instead of robust evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, encompassing seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the genuine level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the stipulations of the Environmental Impact Assessment framework and National Planning Framework 4, given that protected species have not been sufficiently identified or evaluated. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Under these circumstances, lawful consent cannot be granted.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These inadequacies obstruct a thorough evaluation of the potential impacts on marine ecology and protected species, leading to the overarching conclusion that the application is devoid of a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration is fundamentally flawed due to significant gaps in evidence and internal inconsistencies within the ornithological assessment, which severely undermine its conclusions. It is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, where internationally important seabird populations, many of which are already in decline, are present. However, the application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected.

There exists a critical contradiction in the application, as the developer asserts there

are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence available. The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. Furthermore, the importance of these feeding grounds is inadequately addressed, and the reliance on modelling techniques introduces uncertainty, especially for species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not thoroughly understood.

The siting of turbines within a recognised migratory corridor adds another significant risk, effectively 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 consequences of continued 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 required to conclude that there is no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been reached. This activates the precautionary principle and hinders a lawful conclusion in favour of consent.

Additionally, the identified deficiencies reflect 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. Collectively, these issues render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, preventing a thorough evaluation of impacts and leading to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that involved focus groups with local residents, but the full report has not been made public. This omission creates a significant evidential gap and hinders both public understanding and the competent authority's ability to evaluate social risks identified in the developer's research. Available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts stem from direct engagement with the community and are not mere speculation. However, the lack of access to the complete assessment limits scrutiny of the findings and affects the evaluation of their significance in the decision-making process.

The proposal has also been perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Nevertheless, these impacts have not been adequately incorporated into the main application or given the necessary attention. The failure to disclose the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for projects of this magnitude, especially when community character and functioning are at stake. Without the complete dataset, the application does not provide a full evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, existing evidence suggests negative effects that have not been fully revealed. Without the complete assessment, it cannot be shown that the application complies with this policy.

The procedural implications of this situation are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, marking a material omission within the application. This represents a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This limits the ability to make a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally inadequate, failing to reflect both the scale of change anticipated and the sensitivity of the receiving environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, a largely undeveloped landscape, and a notable sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would impose a continuous and overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application does not sufficiently represent the extent of this visual change. Given the size and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. Such a situation would directly compromise visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its significance within the context of this sensitive landscape.

Concerns arise regarding the methodology employed in selecting and presenting visual viewpoints. Available evidence indicates that the chosen viewpoints may inadequately represent the most sensitive receptors or potential worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This shortcoming introduces a risk that the visual impact has been understated, thus undermining the overall reliability of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones, along with other Scheduled Monuments, are situated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. Treating these as isolated elements fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The proposed scale of change contradicts the imperative to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The absence of a thorough worst-case assessment further detracts from any assertion of policy adherence.

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

Collectively, these deficiencies illustrate that the assessment fails to accurately convey the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. Such shortcomings hinder a dependable evaluation and substantiate the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal outlines substantial seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans. This deficiency means that a meaningful assessment of environmental effects is not possible. The application relies on undefined future mitigation and contingency measures that are to be prepared post-consent, which raises significant concerns regarding their adequacy and effectiveness.

The sensitivity of the receiving environment, particularly along the West Lewis coastline, is notable. This area supports clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. While the application acknowledges risks, such as sediment mobilisation and potential chemical or oil spills, it does not provide sufficient detail on preventative, control, or monitoring measures.

There is also a lack of clarity 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 impacts of these disturbances. This uncertainty includes potential effects on marine species and habitats that have already been identified as sensitive in broader assessments.

The absence of detailed emergency response procedures amplifies these concerns. By postponing contingency planning to a stage after consent, the application hinders the evaluation of whether appropriate safeguards are established to handle pollution events. This deferral introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be considered before consent is granted, and a lawful determination cannot be achieved in the absence of this critical information. Additionally, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and certainty surrounding potential impacts renders the assessment materially deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks, thereby reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the current application does not adequately address the ecological or socio-economic impacts associated with its proposal. It fails to demonstrate how these vital habitats and activities can be preserved without causing significant disruption.

A critical flaw in the assessment is the assumption that fishing activities can simply be moved without any consequences. The application lacks evidence to suggest that alternative fishing grounds are available or that they could sustain the additional pressure resulting from this displacement. This oversight is crucial, as it could lead to overfishing in other areas and have detrimental economic effects on the local fishing fleet. Without a solid evidence base, the potential impacts on fisheries and livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly due to the underwater noise created during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, particularly affecting populations such as dolphins. The anticipated impact on a substantial portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses these concerns, lacking the necessary supporting evidence.

Additionally, there is an evident inconsistency within the application regarding the need for licenses to permit harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction severely undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where expected harm necessitates legal approval.

Moreover, the assessment overlooks cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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 existing marine users or mitigate unacceptable impacts on marine biodiversity, thus obstructing any argument that the proposal aligns with sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the development of onshore infrastructure linked to offshore turbines. However, the assessment of these onshore elements is materially incomplete, failing to consider the integrated nature of the project and its full environmental and socio-economic impacts. The cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure traverse sensitive landscapes and involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The current application does not offer a thorough evaluation of these impacts, limiting the understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application undermines the ability to evaluate cumulative effects effectively. The Environmental

Impact Assessment process stipulates that all components of a project should be assessed together. However, the distinct separation of onshore and offshore elements obscures the combined impacts on peatlands, habitats, and local communities.

Significant risks remain for sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application fails to illustrate that the impacts on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been implemented, resulting in a clear evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance associated with the proposal. Disturbances to peatland could release stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or demonstrate that the overall carbon balance is advantageous.

Furthermore, the routing of infrastructure through active croft land introduces possible conflicts with existing land use and legal rights. There is a lack of evidence that necessary consents or processes have been initiated, which raises doubts about the deliverability and legality of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife is a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a persistent and disruptive "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 both residents and visitors. This is particularly concerning given the role that dark skies play in the area's identity and the growth of sectors like astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall assessment of the landscape and environmental factors.

A more pressing concern is the absence of analysis regarding the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting due to their phototactic responses, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment for lighting or a study on phototaxis, thus neglecting the potential effects of aviation lighting on these species and their mortality rates.

Compounding this issue is the reliance on daytime survey data within the ornithological assessment, which does not adequately represent nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this potential danger has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4, particularly concerning the protection of natural places and environmental quality. They also undermine the overall evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the ecosystem.

Collectively, the lack of assessment regarding dark skies and nocturnal wildlife presents a substantial evidential shortfall. The absence of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and inadequate for supporting a lawful decision.

TOURISM

The evaluation of tourism impacts within the application is significantly lacking, with a failure to assess the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application indicates that 86% of visitors are attracted by the scenery, it does not provide any quantified assessment regarding how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million currently, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not analyse how the industrialisation of the seascape and the degradation of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the island. The lack of such

an assessment means it is impossible to ascertain whether the proposed development would yield a net economic benefit or threaten an established and expanding sector.

Moreover, the assessment neglects the crucial role that environmental quality plays in attracting tourists, particularly regarding the preservation of unspoiled landscapes and dark skies that enhance visitor experiences. This oversight is further exacerbated by the omission of a Dark Skies Assessment, resulting in a significant gap in understanding the implications for a recognised and burgeoning segment of the local economy, such as nature-based tourism and astro-tourism.

In the context of an island community characterised by limited economic diversification, the lack of a thorough assessment of tourism impacts bears broader consequences for employment, local businesses, and the sustainability of communities. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the need to show a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Overall, the combined failure to quantify tourism impacts, assess the environmental drivers that influence visitor behaviour, and recognise the economic dependencies of the island culminates in a significant evidential gap. This deficiency hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

There are significant gaps in the baseline data, which are compounded by the use of an undefined design envelope and a reliance on unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

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

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

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

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

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

Additional Comments

I formally object the plans for the Isle of Lewis. I have always dreamed of visiting for its untouched and wild beauty. Industrialising the sea with massive turbines would destroy the very reason people like me want to visit.

I believe the industrialisation of this marine environment poses a direct threat to the survival of the island's iconic wildlife. I am very concerned that the construction noise will cause trauma to seals and dolphins, while the massive turbines create a permanent collision risk for protected birds like the Golden Eagle and Gannet.

Disrupting these delicate ecosystems risks irreparable damage to the biodiversity.

We must protect this treasured place from being turned into an industrial zone. I am objecting because this development would destroy everything that makes the Isle of Lewis such a beautiful and special place.

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: CDC2155F

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, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline and rich cultural identity. Concerns arise from the scale, proximity, and design of the wind farm, raising questions about its alignment with statutory requirements, national policy, and sustainable development principles.

A critical review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. There is missing critical environmental data, and the baseline information provided is both limited and inconsistent. Additionally, key aspects of the proposal remain undefined, which hinders a clear understanding of its likely significant effects. The use of a flexible design framework complicates the assessment further, while the unspecified reliance on mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

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

The unprecedented scale of the proposal introduces large turbines in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, it is essential to invoke the precautionary principle.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal lacks a comprehensive and reliable Environmental Impact Assessment Report, which fails to adequately detail the potential environmental effects associated with the development. A flexible Project Design Envelope is utilised without clear

commitments to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hinders the ability to apply a consistent worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development, thereby obstructing both public and competent authority understanding of the true environmental effects.

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

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

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

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

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 presents significant gaps in evidence and contains internal inconsistencies that fundamentally undermine its conclusions. Notably, the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to demonstrate, to the required evidential standard, that these species will not be adversely affected. The development site is situated within key foraging areas and migratory pathways, yet there is an inadequate evaluation of the implications related to displacement, collision risk, or habitat loss.

A critical contradiction arises within the application, as the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats

Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly addressed, and reliance on modelling approaches introduces considerable uncertainty, particularly for species experiencing severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly in instances where baseline data is incomplete and behavioural responses are not fully understood.

The proposed siting of turbines within a recognised migratory corridor poses an additional and substantial risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently analyse the long-term consequences of sustained mortality within this corridor, nor the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, thereby preventing a lawful conclusion in favour of consent. Additionally, the identified deficiencies represent non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment's internal inconsistencies, methodological weaknesses, and lack of adequate evidence contribute to its overall unreliability. These issues hinder a comprehensive evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is critically flawed, neglecting to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interconnected. The application adopts an overly simplistic view, reducing heritage to isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight fails to consider their current use and the implications of development on their surroundings, resulting in an incomplete evaluation of cultural

effects and overlooking their vital role in community life.

Moreover, the application neglects to assess intangible cultural heritage, such as the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These elements are fundamental to the area's identity but are completely absent from the assessment, which is a major shortcoming. The cultural impact of the development cannot be accurately gauged without considering these factors.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement compromises the credibility of the assessment and fails to adhere to established principles of participation in decisions impacting cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This failure prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, particularly regarding the safeguarding of historic assets and sites. The failure to adequately consider both tangible and intangible heritage, along with the disregard for living cultural practices, indicates a clear violation of policy expectations.

When these factors are collectively examined, it is evident that the failure to assess living heritage, intangible cultural value, community rights, and statutory requirements 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 genuine cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment raises serious concerns regarding the adequacy of the application and its adherence to the necessary legal standards for evaluation. Although the developer undertook a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This lack of transparency results in a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks highlighted in the developer's own research.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts have been identified through direct engagement and are not merely conjectural. However,

the absence of the full assessment hampers proper scrutiny of these findings and diminishes the ability to assess their significance in the decision-making process.

The proposal is also perceived as a threat to community identity and cohesion, with references to "cultural loss" found within the developer's own findings. Yet, these impacts have not been thoroughly incorporated into the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. Without the complete dataset, the application fails to provide a full evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, the existing evidence points to adverse effects that have not been fully disclosed. In the absence of the complete assessment, demonstrating compliance with this policy is impossible.

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

In conclusion, the combination of non-disclosure of the complete Social Impact Assessment and evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation hinders a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts is significantly lacking. It does not adequately represent the scale of change or the sensitivity of the environment. The West Lewis coastline has an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The planned large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The visual change has not been properly reflected in the application. The turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The significance of this impact has not been effectively conveyed in the assessment, particularly in a sensitive landscape such as this.

Methodological issues exist regarding how visual viewpoints were selected and presented. There is evidence that the viewpoints do not represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This suggests that the visual impact may be understated, calling into question the reliability of the assessment.

Moreover, the assessment fails to evaluate the interconnectedness of the landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that shares visual and spatial connections to the Atlantic horizon. These assets are treated as isolated rather than acknowledging their interdependence, leading to an incomplete assessment of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4, which seeks to protect natural areas and historic assets. The scale of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

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. Therefore, the resulting changes would be fundamental and permanent, rather than reducible to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks the necessary detail for a thorough assessment of construction and pollution risks, which is critical for evaluating potential environmental effects. Significant seabed preparation and installation works are planned within a high-energy Atlantic environment; however, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application relies on future mitigation and contingency measures that are to be developed post-consent, inhibiting a meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming, given the

sensitivity of the receiving environment. The West Lewis coastline is known for its clean coastal waters and essential 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 offer sufficient detail regarding prevention, control, or monitoring measures.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these effects. This uncertainty also encompasses potential consequences for marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards exist to address pollution events. This introduces procedural risks and diminishes the competent authority's ability to assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the deferral of vital environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and the corresponding mitigation measures must be evaluated before consent, and the absence of such critical information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development includes significant onshore infrastructure elements such as the construction of a substation near Stornoway, cabling across protected moorland, and access routes through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. However, the application fails to provide a comprehensive assessment of these impacts, leaving a critical gap in understanding the overall environmental footprint of the project.

A significant concern arises from the fragmented assessment approach, which treats offshore turbines and onshore works separately despite their intrinsic link. This separation obscures the cumulative effects on peatlands, habitats, and local communities, which must be evaluated collectively as stipulated by the Environmental

Impact Assessment process. The exclusion of onshore impacts undermines the ability to fully comprehend the project's overall implications.

Furthermore, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate a thorough assessment of potential impacts on these habitats or indicate that adequate avoidance measures have been considered, creating a notable evidential gap concerning biodiversity protection.

The proposal also raises critical questions about carbon balance, as the disturbance of peatland releases stored carbon, potentially creating a carbon debt contrary to renewable energy objectives. The application inadequately addresses this issue, failing to prove that the overall carbon balance remains advantageous.

Additionally, routing the infrastructure through active croft land poses conflicts with existing land uses and legal rights. There is no evidence that necessary consents or processes have been initiated, raising significant concerns about the feasibility and legality of the project.

Overall, the failure to assess the project comprehensively, combined with the lack of evidence concerning environmental impacts and land use considerations, directly conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further casts doubt on the application, rendering it incomplete and unreliable, and preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding nocturnal wildlife and dark skies presents a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, a vital aspect of its environmental quality, cultural identity, and tourism value. However, the proposal introduces permanent red aviation lighting, which would be visible over long distances, creating a continuous and intrusive "wall of light" effect that fundamentally alters the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the area's identity and the emergence of tourism sectors like astro-tourism, this omission is critical. As a result, there exists a clear gap in the overall assessment of the landscape and environment.

Equally concerning is the lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting because of phototaxis, which can lead to disorientation and increased risks of collision. The absence of any lighting impact assessment or phototaxis study means that the proposal does not account for the

potential effects of aviation lighting on these species or the risk of increased mortality.

This gap is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activity or the associated risks. Species like Kittiwakes, known to forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. Consequently, the lack of site-specific night-time data creates a critical void in understanding ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites would face adverse consequences. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4, which emphasises the protection of natural places and environmental quality. Additionally, they undermine the broader evaluation of landscape and seascape impacts, as night-time character is an essential component of the environment.

In summary, the failure to assess dark skies and nocturnal wildlife constitutes a significant gap in evidence. 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 related to the proposed development is fundamentally inadequate and does not address the economic and social repercussions for a crucial sector of the Isle of Lewis economy. The area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness are vital to tourism, which has seen substantial 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. Despite acknowledging that 86% of visitors are motivated by scenery, the application fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of tourism.

Furthermore, the application does not model the potential impacts of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience of the island. Without this critical analysis, it remains unclear whether the development could result in a net economic benefit or detract from an established and burgeoning sector.

The assessment neglects to consider the significance of environmental quality in enhancing the tourism experience, particularly regarding the value of unspoiled landscapes and dark skies for visitors, as well as emerging markets like nature-based

tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a notable void in understanding the impacts on a recognized and expanding segment of the local economy.

Given the island's limited economic diversification, the failure to evaluate tourism impacts poses 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 assessed as required under 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 requirement to demonstrate net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Overall, the shortcomings in quantifying tourism impacts, analysing environmental influences on visitor behaviour, and acknowledging the island's economic reliance culminate in a significant evidential gap, undermining the ability to conduct a thorough evaluation of the economic effects and leading to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the requirements for sustainable development, as it does not satisfy statutory duties, national policy, or evidential standards. This application is strikingly similar to the rejected Lewis Wind Power proposal from 2008, where the level of industrialisation was deemed unacceptable. Despite being submitted under a framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application still falls short.

A significant concern is the lack of a complete and reliable evidential basis for evaluation. It contains critical gaps in baseline data, relies on an undefined design envelope, and depends on unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, and the failure to disclose a full Social Impact Assessment is a material omission. These shortcomings prevent an accurate assessment of impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct contradiction to National Planning Framework 4, the proposal does not

adequately demonstrate protection for biodiversity, natural places, and cultural heritage. It fails to show acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements remain inadequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and internally inconsistent. The evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been met, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

Moreover, 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, the disruption of cultural and visual relationships, and the detrimental impacts on tourism represent permanent effects that cannot be mitigated to an acceptable level.

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

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

Additional Comments

We visited the Isle of Lewis for many years as tourists. 7 years ago we made it our home as we loved it so much. It is one of the most unspoilt places in the UK, it is wild and beautiful, both myself and my husband are artists and value the inspiration living in this place brings us. While I am not against renewable energy I think this is totally the wrong place to put it. The negative impact that the placement and size of it hasn't been correctly 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: DBDF643E

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a comprehensive review of the Environmental Impact Assessment Report and associated documentation, revealing significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the proposal's scale, proximity, and design, as these factors fundamentally challenge its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Key components of the proposal remain undefined, and the use of a flexible design framework complicates the assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures hinders the evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantive policy conflicts are evident within the proposal. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate adherence to 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 ability to affirm the development's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines positioned near the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance underscores the application's incompleteness and its incapacity to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings that compromise its reliability in evaluating the environmental implications of the proposal. A key concern is the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty, making it difficult to consistently apply a worst-case scenario. As a result, the assessment lacks integrity, preventing both the public and the competent authority from fully grasping the potential environmental effects of the development that may ultimately occur.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under these conditions means environmental harm would only be addressed later, hindering a thorough evaluation of effectiveness or residual impacts. This postponement of critical information contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and the necessary mitigation be clearly established before any determination.

Additionally, there are notable evidential deficiencies, including gaps in baseline data and methodological limitations, compounded by a reliance on assumptions rather than site-specific evidence. This lack of thoroughness results in uncertainty about the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. Such deficiencies prevent a comprehensive understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly for protected species and sensitive habitats. Furthermore, the proposal fails to align with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is impossible to demonstrate that impacts have been thoroughly assessed or that adequate safeguards are established.

In conclusion, the combination of reliance on an undefined design envelope, the lack of specified mitigation measures, and the absence of sufficient baseline data results in an Environmental Impact Assessment Report that is both unreliable and incomplete. These inadequacies hinder a lawful and robust assessment of environmental effects, placing the competent authority in a position where it cannot make an informed decision based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The absence of a thorough alternatives assessment is deeply concerning and fails to satisfy the necessary requirements of the Environmental Impact Assessment regime. Instead of delivering a systematic and reasoned comparison of viable alternatives based on environmental implications, the application merely narrates the project's development. This narrative approach does not adequately prove that less harmful

options have been appropriately identified, evaluated, and chosen over more damaging ones.

Moreover, there is a notable lack of transparent and evidence-based evaluations of alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely contemplated placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The sensitivity of the West Lewis coastline, alongside the critical role of proximity to shore in determining impact, makes this absence of analysis particularly troubling. Without such evaluation, one cannot ascertain that the proposed location is indeed the least damaging option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been sufficiently considered to avoid or lessen impacts on sensitive receptors. This includes significant sites of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear strategy for avoidance, coupled with insufficient comparative analysis, suggests that the application has not implemented mitigation by design, instead relying on measures that come after the design phase.

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 and hinders the competent authority's ability to determine whether more suitable and less harmful alternatives exist. Without a comprehensive assessment of alternatives, one cannot conclude that the proposal is a sustainable or compliant solution with existing policies.

From a policy standpoint, this inadequacy jeopardises alignment with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a significant omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant shortcomings, failing to deliver a thorough and reliable understanding of the ecological receptors within the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data remains incomplete. The methodologies employed do not effectively capture essential details about species presence, behaviour, and habitat use, leading to a lack of sound evidential basis for evaluating potential impacts.

Of particular concern is the omission regarding otters, which are 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 results in an insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks suffers from reliance on aerial surveys, which introduces considerable detection bias, particularly in Atlantic conditions. This approach is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The omission of such data contributes to an incomplete baseline, further weakening the reliability of the conclusions reached.

The methodological limitations present mean that any assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. Without sufficient baseline data, it is impossible to conduct a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This creates a level of uncertainty regarding the genuine 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 protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, the granting of consent cannot be justified legally.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an assessment that is fundamentally unreliable. These deficiencies impede a thorough evaluation of impacts on marine ecology and protected species, leading to the overarching determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development on the west coast of the Isle of Lewis threatens internationally important seabird populations, which are already experiencing declines. The ornithological assessment associated with the application is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that compromise its conclusions. It fails to adequately demonstrate that these species will not face adverse effects, particularly since the turbines are sited within key foraging areas and migratory pathways. The assessment lacks a robust evaluation of displacement, collision risk, or habitat loss, which is essential for understanding the potential impacts on these vulnerable birds.

Furthermore, the application presents a contradiction by asserting that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only required when significant harm is anticipated. This

inconsistency raises serious doubts about the reliability of the assessment and indicates that its conclusions are not sufficiently supported by evidence. It does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these vital feeding grounds has not been fully acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species in severe decline like Kittiwakes and Fulmars. Additionally, the methodologies applied likely underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not well understood.

The placement of turbines in a recognised migratory corridor poses an additional and significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The assessment does not sufficiently evaluate the long-term implications of sustained mortality in this corridor or the potential repercussions for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to affirm no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and limitations in modelling, fails to achieve the standard of beyond reasonable scientific doubt. This situation invokes the precautionary principle and undermines a lawful conclusion in favour of consent. Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally inadequate, failing to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. The approach adopted by the application is reductive, treating heritage as a series of isolated, static assets rather than acknowledging their ongoing social, cultural, and spiritual function within the community.

A significant deficiency is evident in the treatment of culturally important sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These are active places of burial and spiritual practice, yet the assessment categorises them as static features. This oversight neglects their continued use, meaning, and the potential impact of development on their setting. Such mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their role within community life.

Moreover, the assessment does not consider intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are crucial to the area's identity but are entirely absent from the evaluation, representing a significant omission. The cultural impact of the development cannot be adequately understood without factoring in these components.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population possesses a distinct cultural identity with characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

From a policy perspective, the identified deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with a lack of recognition of living cultural practices, constitutes a clear departure from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Existing summaries reveal that residents are currently enduring significant stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement and are therefore factual rather than

speculative. The failure to disclose the complete assessment inhibits proper scrutiny of these findings and limits the determination of their significance within the decision-making process.

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately capture both the scale of change and the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a profound sense of remoteness. The proposed large-scale turbines, sited in close proximity to the shore, would result in an overwhelming industrial presence that fundamentally transforms this landscape, leading to permanent and irreversible changes.

Furthermore, the application does not accurately depict the extent of the visual impact

resulting from the turbines. Their size and closeness would overshadow views from residential areas, historic sites, and popular coastal locations, thereby diminishing visual amenity and undermining the qualities of naturalness and remoteness that define this area. The assessment lacks an appropriate representation of this level of impact, especially considering the sensitivity of the landscape.

Concerns also arise regarding the methodology employed in selecting and presenting visual viewpoints. It appears that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This inadequacy raises the possibility that the visual impact has been underestimated, which calls into question the reliability of the assessment.

Another notable gap in the assessment is the neglect of the interconnected relationships between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially linked to the Atlantic horizon. However, the evaluation treats these heritage assets as separate entities, failing to acknowledge their interdependence and resulting in an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This represents not just a visual impact but a more extensive cultural and spatial detriment that the application has not sufficiently examined.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historic assets. The scale of transformation is at odds with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further detracts from any assertions of policy adherence.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes brought about by this proposal are not amenable to reduction through mitigation measures, leading to fundamental and permanent alterations in the landscape.

In summary, the assessment does not accurately portray the extent of impact, the environmental sensitivity, or the interconnectedness of landscape and heritage. These shortcomings prevent a reliable evaluation and solidify the conclusion that the proposal is incompatible with the protection of this important landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant concerns regarding the incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate potential environmental impacts. It involves extensive seabed preparation and installation activities in the high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application depends on mitigation and contingency measures that are to be developed after consent, which hinders any meaningful evaluation of their sufficiency or effectiveness.

This reliance on unspecified future measures is particularly troubling due to the sensitivity of the surrounding environment. 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 such as sediment mobilisation and possible chemical or oil spills, it fails to outline adequate strategies for their prevention, control, or monitoring.

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

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application obstructs the ability to evaluate whether suitable safeguards are established to address pollution incidents. This introduces procedural risks and diminishes the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory viewpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be evaluated prior to consent, and without this crucial information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements pertaining to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks thoroughness and does not adequately evaluate ecological or socio-economic impacts. The fishing industry is active off the West Lewis coast, which is home to a diverse marine ecosystem.

However, the application does not prove that these habitats and uses can be safeguarded or sustained without significant disruption.

A major concern is the assumption that fishing activities can be moved without consequences. The application fails to provide evidence that alternative fishing grounds are available and accessible, or that they can handle additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas and might have broader economic repercussions for the local fishing fleet. The consequences for fisheries and livelihoods cannot be comprehensively understood without a clear and evidence-based assessment.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across considerable distances, impacting species such as dolphins. The potential disturbance to a notable portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without sufficient evidence to support such claims.

There is also a notable inconsistency in the application, as it acknowledges the need for licenses to allow harm to European Protected Species, while simultaneously stating that the impacts are negligible. This contradiction weakens the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at levels requiring legal authorisation.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is necessary to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the insufficiency of evidence regarding fishing displacement, the minimization of acoustic impacts, and the internal contradictions indicate that the assessment is incomplete and unreliable. These shortcomings hinder a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is fundamentally incomplete, failing to recognise the full extent of impacts associated with what constitutes a single integrated project. The connection between the offshore turbines and onshore works is inherent, yet they are analysed separately, leading to a disjointed evaluation that conceals the real scale of environmental and socio-economic consequences.

Key onshore elements involve cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the associated infrastructure necessary for access through sensitive landscapes. These activities necessitate excavation in areas of deep peat, notably within Barvas Moor, an important carbon store and ecologically valuable habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered in unison; however, the division of offshore and onshore elements obscures the comprehensive impacts on peatlands, habitats, and local communities.

There exist significant risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not show that the impacts on these habitats have been thoroughly evaluated or that adequate avoidance measures have been implemented, resulting in a marked evidential gap concerning biodiversity protection.

Concerns are also raised regarding carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. The application fails to adequately tackle this concern or illustrate that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application does not provide proof that the requisite consents or processes have commenced, thus casting doubt on deliverability and lawful execution.

From a policy standpoint, the inability 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 failure to show that impacts can be avoided or mitigated further weakens the application.

In conclusion, the separation 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, obstructing a lawful determination.

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 application for the Spiorad na Mara Offshore Wind Farm illustrates significant shortcomings in meeting the standards required for sustainable development, failing to comply with statutory obligations and national policy. The proposal is reminiscent of the previously rejected Lewis Wind Power initiative from 2008, which was deemed excessively industrialised. Despite being presented under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not address the essential issues identified in the past.

A reliable evidential basis for decision-making is notably absent, with critical gaps in baseline data and an undefined design envelope. The application depends on

unspecified mitigation measures, and it neglects to consider key impact pathways such as those affecting nocturnal wildlife, the entirety of onshore infrastructure, and tourism consequences. As a result, the Environmental Impact Assessment is incomplete, hampering a full understanding of the likely significant effects and residual impacts.

The proposal also suffers from procedural deficiencies. Notably, it lacks a compliant Island Communities Impact Assessment, violating the Islands (Scotland) Act 2018, and does not disclose a complete Social Impact Assessment, which is a significant omission. These shortcomings hinder the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In terms of compliance with National Planning Framework 4, the proposal falls short. It fails to safeguard biodiversity, natural landscapes, and cultural heritage, does not adequately assess health and wellbeing impacts, and lacks evidence of a net economic benefit, especially in terms of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore components has not been thoroughly evaluated, leaving uncertainties regarding their effects on peatlands, carbon balance, habitats, and crofting land.

The 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 exhibit inconsistencies. 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.

This proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline would result in the loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, yielding permanent changes that cannot be mitigated effectively.

When considering all these factors, the application emerges as procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent for this application or invoke the necessary regulatory provisions to require the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A00C64D5

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and associated documents, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The wind farm is proposed to be located off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the proposal centre on its scale, proximity to the shore, and design, raising questions about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework does not allow for a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to offer a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by strong evidence.

There are significant policy conflicts within the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain whether the development is acceptable from a policy standpoint.

The unprecedented scale of the proposal presents additional concerns, with large turbines positioned very close to the shoreline, raising issues of landscape capacity, visual dominance, and environmental impact. Overall, the lack of adequate information, dependence on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to adequately account for the likely environmental effects of the proposal. The application utilises a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, which introduces significant uncertainty. This lack of commitment prevents a consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts presented may not accurately reflect the development that will be constructed, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions implies that environmental harm will be addressed later, thereby obstructing any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and conflicts with the Environmental Impact Assessment regime's objective, which mandates that likely significant effects and mitigation strategies be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives lacks the necessary depth and does not fulfil the requirements of the Environmental Impact Assessment regime. Instead of offering a detailed comparison of realistic alternatives based on their environmental impacts, the

application merely presents a narrative of how the project has developed. This method fails to show that less harmful options have been adequately identified, evaluated, and chosen over more damaging alternatives.

There is no clear or evidence-based examination of alternative offshore sites, development sizes, or design configurations. Notably, the application does not indicate that the developer has seriously considered positioning the turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis prevents any assertion that the proposed location is the least damaging available.

These shortcomings also affect the evaluation of cable routing and landfall, where there is insufficient evidence that alternative routes have been adequately investigated to prevent or lessen effects on sensitive areas. This includes significant sites such as Barvas Cemetery, which hold cultural and spiritual importance. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation through design has not been implemented, relying instead on measures to mitigate after design has been completed.

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

From a policy standpoint, this inadequacy challenges adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been properly assessed and cannot be deemed lawful.

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 application is fundamentally flawed, particularly in its ornithological assessment, which contains significant gaps and internal inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application does not sufficiently demonstrate that these species will not be adversely affected. The proposed development is situated within key foraging areas and migratory pathways, yet the assessment fails to adequately evaluate the implications of displacement, collision risk, or habitat loss.

There is a notable contradiction within the application itself, as the developer concludes that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions are not backed by the available evidence. The assessment lacks adequate evidence to ensure that seabirds associated

with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully considered, and the reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully understood.

Placing turbines within a recognised migratory corridor poses an additional and substantial risk, effectively acting as a barrier in a key flight path for species travelling between the United Kingdom and Iceland. The application does not provide a thorough assessment of the long-term consequences of sustained mortality in this corridor, nor does it evaluate the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to confirm 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 invokes the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, the identified deficiencies represent 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 not be adversely affected puts the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of the impacts and support the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces heritage to isolated, static elements, overlooking their ongoing significance within the community.

A notable shortcoming is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites of burial and spiritual practice. The assessment incorrectly categorises these as static features, neglecting their continuous use and the implications of development on their surrounding environment. This misunderstanding leads to an incomplete appraisal of cultural effects, disregarding their integral part in community life.

The absence of consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's enduring connection to the coastal environment, further compounds these issues. These aspects are vital to the area's

identity yet are entirely overlooked in the assessment, representing a considerable gap. Without addressing these essential elements, the true cultural impact of the development remains misunderstood.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been involved in a Free, Prior and Informed Consent process. This lack of genuine engagement calls into question the validity of the assessment and neglects established principles that govern participation in matters affecting cultural and environmental interests.

Moreover, a critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

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

Ultimately, the disregard for living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently assessed, and the application lacks the necessary foundation for an accurate evaluation of the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Furthermore, the proposal is perceived as a direct threat to community identity and

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts, seascape, and landscape is fundamentally inadequate, failing to capture the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, a lack of development, and a strong sense of isolation. The proposed large-scale turbines situated near the shoreline would introduce a continuous industrial presence, fundamentally altering this landscape and leading to a permanent transformation of its character.

The application does not sufficiently represent the extent of visual alteration. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and representation of visual viewpoints. It appears that the selected viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This raises concerns that the magnitude of visual impact has been underestimated, thus compromising the reliability of the assessment.

Moreover, there is a notable lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. The assessment approaches these sites as isolated rather than recognising their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The industrialisation of the seascape would disrupt these connections, changing the context in which heritage assets are perceived and severing their ties to the natural horizon. This constitutes not only a visual impact but also a more profound cultural and spatial detriment that has not been adequately examined within the application.

From a policy standpoint, the proposal contradicts the principles of National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The scale of transformation is at odds with the requirements to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a rigorous worst-case assessment further weakens the argument for compliance with policy guidelines.

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

Collectively, these issues highlight the assessment's failure to accurately portray the impact's scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. Such deficiencies hinder a reliable evaluation and further support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks critical detail in its assessment of construction and pollution risks, which is essential for evaluating potential environmental effects. With substantial seabed preparation and installation works planned for a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. Instead, the application relies on mitigation and contingency measures that are set to be prepared after consent, which obstructs any meaningful assessment of their adequacy or effectiveness.

The reliance on undefined future measures raises particular concerns given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are at risk from sediment disturbance and contamination. While the application does recognise risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on preventive, control, or monitoring measures for these incidents.

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

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory viewpoint, the deferral of crucial environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent, and a lawful determination cannot be made in the absence of such information. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty concerning potential impacts collectively render the assessment materially deficient. These failings prevent a thorough evaluation of construction and pollution risks and support 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.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is significantly lacking and does not take into account the full range of impacts associated with what constitutes a single integrated project. There is an intrinsic link between the offshore turbines and the onshore works, which are assessed separately. This fragmented approach conceals the true magnitude of the environmental and socio-economic repercussions.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure

through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By omitting or delaying the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all parts of a project be considered collectively; however, the separation of offshore and onshore elements results in a lack of understanding regarding the combined effects on peatlands, habitats, and local communities.

There are considerable risks to vulnerable habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not show that the impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a notable evidential gap in terms of biodiversity protection.

The proposal also poses concerns regarding carbon balance. Disturbance to peatland can release stored carbon, potentially leading to a carbon debt that opposes the goals of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains advantageous.

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

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

Collectively, the disjunction of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to address the assessment of dark skies and nocturnal wildlife, which constitutes a material omission. The West Lewis coastline is known for its exceptionally dark skies, which are crucial to environmental quality, cultural identity, and tourism value. The proposed development includes the installation of 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 neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly significant given the importance of dark skies to the area's identity and the burgeoning astro-tourism sector. The failure to consider these impacts creates a notable gap in the overall landscape and environmental assessment.

More alarmingly, there is no analysis of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application lacks any form of lighting impact assessment or phototaxis study, failing to explore how aviation lighting could affect these species or contribute to increased mortality.

This omission is further exacerbated by an overreliance on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or related risks. For instance, Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has been ignored. The absence of site-specific night-time data presents a significant gap in the understanding of ecological impacts.

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

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

In summary, the lack of any assessment pertaining to dark skies and nocturnal wildlife represents 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 within the application is inadequate, particularly in relation to the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Despite acknowledging that 86% of visitors are attracted by the scenery, the application lacks a quantitative analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not examine how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to ascertain whether the development would bring a net economic benefit or jeopardise an established and thriving sector.

Furthermore, the assessment neglects to consider how environmental quality supports tourism, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this deficiency, leaving a critical gap in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impact and the requirement for showing net benefit. It also contradicts strategic objectives that position tourism as a priority growth sector and fails to present adequate evidence for the competent authority to assess the economic ramifications of the proposal.

In summary, the lack of quantification regarding tourism impacts, the omission of analyses on environmental influences on visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential shortfall. This gap hinders a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development in relation to statutory duties, national policy, and evidential requirements. This proposal echoes the fundamental concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. It is now presented with a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing more strongly than before.

There are major deficiencies in the evidential basis necessary for determination. Critical gaps in baseline data exist, alongside the continued use of an undefined design envelope, and reliance on unspecified mitigation measures. Additionally, key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and

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

The application also exhibits clear procedural deficiencies. A compliant Island Communities Impact Assessment is lacking, which breaches the statutory obligations set forth in the Islands (Scotland) Act 2018. Furthermore, the non-disclosure of a complete Social Impact Assessment is a material omission. Such failings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

In terms of policy compliance, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural spaces, and cultural heritage. Health and wellbeing impacts are not demonstrated as acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements is insufficient, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are not only incomplete but, in some areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and rendering a lawful conclusion regarding the acceptability of impacts impossible.

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

When considered as a whole, the application is both procedurally and substantively unfit for determination. The extent of information gaps, alongside policy conflicts and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority must either refuse consent on these grounds or utilise the relevant regulatory provisions to require the submission of the necessary missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: E120710D

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 marine licensing and Environmental Impact Assessment regulations. The objection arises from an examination of the Environmental Impact Assessment Report and associated documentation, highlighting material deficiencies in planning, environmental considerations, cultural factors, and procedural adherence. The project is proposed off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine natural environment, and strong cultural heritage. Concerns about the proposal's scale, proximity to the coast, and design raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for a lawful decision. There is an absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key components of the proposal remain undefined. The flexible design framework complicates the assessment of likely significant impacts, and the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation fails to provide a complete or informed understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by solid evidence.

There are significant policy conflicts evident in the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and public health and wellbeing. The application does not convincingly demonstrate compliance with national standards for protecting biodiversity, climate concerns, and environmental integrity. These discrepancies directly impact the statutory tests for consent and compromise the competent authority's ability to determine whether the development is acceptable within policy guidelines.

The proposal's scale is unprecedented for this area, with large turbines situated close to the shoreline, raising serious concerns about landscape capacity, visual impact, and environmental repercussions. The combination of insufficient information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrates that the application is incomplete and unsuitable for lawful approval. Under these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that compromise its reliability and transparency concerning the environmental effects of the proposal. A flexible Project Design Envelope is utilised, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces a level of uncertainty that undermines the integrity of the assessment, resulting in impacts that may not accurately reflect the final development. Consequently, both the public and the competent authority are left without a true understanding of the potential environmental consequences.

Furthermore, the application is heavily reliant on mitigation measures and management plans that have yet to be defined. Seeking consent under these conditions means that potential environmental harm is deferred for later consideration, which hinders any meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. This approach is procedurally unacceptable, as it conflicts with the purpose of the Environmental Impact Assessment regime that necessitates clear establishment of likely significant effects and mitigation prior to determination.

Significant evidential gaps also exist, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold established under 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. The proposal further fails to demonstrate adherence to National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be substantiated that impacts have been fully assessed or that adequate safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation strategies, and gaps in baseline data culminates in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The absence of a rigorous and thorough assessment of alternatives is alarming and fundamentally undermines the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a clear, reasoned comparison of viable alternatives based on their environmental effects, the application merely recounts the

project's development history. This method falls short of proving that less damaging options have been appropriately identified, assessed, and preferred over more harmful solutions.

Furthermore, there is a lack of transparent, evidence-based comparisons regarding various offshore locations, development sizes, or design configurations. In particular, the application fails to illustrate that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, alongside the crucial role that proximity to shore plays in determining environmental impacts, highlights the significant gap in analysis that prevents a conclusion that the proposed siting is the least damaging option.

These shortcomings extend to the assessments related to cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors. This includes places of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and a comparative analysis indicates that mitigation by design has not been employed, relying instead on measures to mitigate impacts after the design phase.

Consequently, the application does not demonstrate that efforts have been made to minimise environmental harm through thoughtful site selection, layout, and infrastructure routing. This signifies a disregard for the established mitigation hierarchy, which consequently hampers the competent authority's ability to determine whether there are less harmful and more suitable alternatives. Without a comprehensive assessment of alternatives, one cannot assert that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy undermines adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and the wellbeing of local communities. The failure to present a structured and comparative assessment represents a significant omission, contributing to the conclusion that the application has not been thoroughly evaluated and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species lacks comprehensiveness, failing to deliver a reliable overview of the ecological receptors in the West Lewis coastal environment. This area is characterised by its sensitivity and biological activity, yet the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A significant shortcoming pertains to otters, classified as a European Protected Species. The application neglects to appropriately identify and assess their use of

coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction-related disturbances, noise, and increased human activity have not been adequately analysed. As a result, this compromises any conclusions drawn about the absence of significant effects on this species.

In addition, the evaluation of basking sharks is hindered by reliance on aerial surveys, which can introduce substantial detection bias, particularly under challenging Atlantic conditions. This method is likely to lead to an underestimation of their presence, especially when compared to established land-based observations that indicate a frequent presence in these waters. The failure to integrate or properly consider such relevant data culminates in an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological shortcomings outlined lead to conclusions regarding negligible or non-significant effects being based on assumptions rather than on robust evidence. Moreover, the lack of adequate baseline data obstructs meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty about the actual scale of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment regime and the National Planning Framework 4, as there has been an insufficient identification and assessment of protected species. This uncertainty hinders the ability 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.

When considered collectively, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, culminating in the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents an ornithological assessment that is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. This development is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not demonstrate to the required evidential standard that these species will not be adversely affected.

A fundamental contradiction exists within the application. The developer concludes there are no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is expected. This

inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the underlying evidence.

The assessment fails to provide adequate evidence that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces uncertainty, particularly for species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in cases where baseline data is incomplete and behavioural responses are not thoroughly understood.

Moreover, the siting of turbines within a recognised migratory corridor creates an additional and significant risk, effectively forming a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term 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 meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle and obstructs a lawful conclusion in support of consent.

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

In summary, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the 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 severely flawed, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a narrow perspective, treating heritage as a collection of separate, unchanging assets rather than recognising their ongoing social, cultural, and spiritual relevance to 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 burial grounds and places of spiritual significance, yet the assessment erroneously classifies

them as static entities, neglecting their current use, meaning, and the development's effects on their surroundings. This incorrect portrayal leads to an incomplete understanding of cultural impacts and disregards their vital role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship the community has with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the assessment, marking a significant gap. Without recognising these factors, the true cultural impact of the development remains inadequately understood.

There are also serious concerns regarding community rights and involvement. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

A critical procedural oversight is the failure to produce a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to examine the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings position the proposal in direct opposition to the National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This lack of access creates a substantial evidential gap, which hinders the public and the competent authority from fully grasping the range of social risks identified through the developer's own research.

Reports indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct engagement with the community and are not speculative

in nature. The decision to withhold the full assessment restricts meaningful scrutiny of the findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these impacts have not been thoroughly incorporated into the main application nor given the appropriate weight they deserve. The absence of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This deficiency in transparency has implications for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a solid evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm. However, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This gap represents a significant omission in the application and signifies a failure to satisfy the evidential requirements dictated by the Environmental Impact Assessment regime.

In conclusion, the withholding of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. The assessment of seascape, landscape, and visual impacts related to the proposed turbines is materially deficient, failing to adequately reflect the scale of change and the sensitivity of the receiving environment. The introduction of large-scale turbines in close proximity to the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application does not sufficiently represent the magnitude of visual change. The

scale and proximity of the turbines would dominate views from residential areas, historic sites, and widely used coastal locations, directly impacting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive landscape have not been properly conveyed in the assessment.

Moreover, there are methodological concerns regarding the selection and presentation of visual viewpoints. Evidence suggests that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Such shortcomings risk understating the magnitude of visual impact, thus undermining the reliability of the assessment.

The assessment also neglects to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, like the Calanais Standing Stones and other Scheduled Monuments, are integral to a wider landscape setting connected by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy perspective, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claim 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 reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal for substantial seabed preparation and installation works presents significant concerns, particularly due to the incomplete assessment of construction and pollution risks. The high-energy Atlantic environment along the West Lewis coastline, known for its clean coastal waters and important habitats, is at risk from

sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This absence prevents a thorough evaluation of the adequacy and effectiveness of the proposed mitigation and contingency measures, which are deferred to a post-consent stage.

The reliance on undefined future measures is alarming given the sensitivity of the surrounding environment. There is notable 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 extends to potential repercussions on marine species and habitats identified as sensitive in broader assessments.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This procedural risk hinders the competent authority's capacity to assess environmental protection measures at the point of determination.

Regulatory requirements stipulate that likely significant effects and necessary mitigation must be assessed before consent is granted. The deferral of essential environmental safeguards directly conflicts with the Environmental Impact Assessment regime. The application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient, further affirming the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries presented in the application is inadequate, lacking a comprehensive analysis of both ecological and socio-economic effects. The waters adjacent to the West Lewis coast host a rich marine ecosystem and a thriving fishing industry. However, the application does not sufficiently demonstrate that these critical habitats and uses can be preserved without significant disruption.

One of the principal concerns is the presumption that fishing activities can be displaced without repercussions. The application fails to provide evidence regarding the availability, accessibility, or capacity of alternative fishing grounds to accommodate the resultant pressure. This critical omission raises substantial concerns, as displacement could lead to overfishing in different areas, which may have broader economic implications for the local fishing fleet. Without a detailed and evidence-based evaluation, the potential consequences for fisheries and local livelihoods remain unclear.

Additionally, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The prolonged use of high-energy hammer piling is anticipated to disturb marine life over extensive distances, impacting species such as dolphins. Notably, the projected disruption to a significant portion of the local bottlenose dolphin population warrants serious attention, yet the application downplays these impacts, lacking adequate supporting evidence.

There exists a notable inconsistency within the application, where the necessity for licenses to permit harm to European Protected Species is recognised, even while impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises significant compliance issues with the Habitats Regulations, particularly where expected harm requires legal authorisation.

Moreover, the assessment neglects to address cumulative impacts arising from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a holistic 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 sufficiently demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can harmoniously coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Collectively, the absence of evidence related to fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the application contribute to an incomplete and unreliable assessment. These shortcomings impede a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project fails to adequately address the interconnected nature of its components, specifically the offshore turbines and the associated onshore infrastructure. This fragmented approach obscures the full extent of environmental and socio-economic impacts, as the various elements of the project are not evaluated collectively. The implications of this incomplete assessment extend to significant onshore works, which involve cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through ecologically sensitive areas. These activities require excavation in regions of deep peat, notably within Barvas Moor, which is a crucial carbon store and habitat of considerable ecological significance.

Furthermore, by omitting or postponing the evaluation of these onshore impacts, the application undermines the assessment of cumulative effects. The Environmental

Impact Assessment mandates a holistic consideration of all project components; however, the current division between offshore and onshore assessments fails to reveal the combined repercussions on peatlands, ecosystems, and local communities.

There are pressing concerns regarding sensitive habitats, including machair systems and peatland environments, that are recognised in policy protections. The application does not sufficiently demonstrate that these habitats have been thoroughly assessed or that adequate avoidance measures have been implemented, highlighting a significant gap in evidence related to biodiversity protection.

In addition, the routing of infrastructure through active croft land raises potential conflicts with established land uses and legal rights. The application lacks substantiating evidence that the necessary consents or protocols have been pursued, which raises serious doubts about the project's deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project comprehensively, along with the inability to ensure the protection of peatlands and habitats, is in direct conflict with the National Marine Plan and National Planning Framework 4. The lack of demonstrable measures for avoiding or mitigating impacts further weakens the application.

Overall, the separation of project elements, the absence of thorough assessments, and the insufficient evidence regarding environmental and land use impacts render this section of the application fundamentally incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a substantial gap within the Environmental Impact Assessment. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in the area's environmental quality, cultural identity, and tourism potential. The proposal, which includes the introduction of permanent red aviation lighting, would create an intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is critical, given the significance of dark skies to the community's identity and emerging sectors like astro-tourism. The absence of consideration for these impacts creates a notable deficiency in the overall landscape and environmental assessment.

Additionally, there is no analysis regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and heighten the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, failing to examine how the proposed aviation lighting may affect these species or lead to increased mortality rates.

The situation is further exacerbated by reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. For example, Kittiwakes, which may forage or migrate during the night, are also susceptible to disorientation from artificial lighting, yet this risk remains unassessed. The absence of specific night-time data signifies a crucial gap in understanding the ecological implications.

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

From a policy standpoint, the absence of this assessment conflicts with National Planning Framework 4 concerning the protection of natural environments and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts since the character of the night-time environment is an integral component of the ecosystem.

In summary, the failure to address dark skies and nocturnal wildlife creates 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 impact of tourism on the Isle of Lewis is critically significant, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the assessment conducted by the application is profoundly deficient, failing to adequately evaluate how large-scale offshore infrastructure may affect visitor numbers, behaviour, or overall economic contributions. It is acknowledged that 86% of visitors are attracted by the area's stunning scenery, yet there is no quantified analysis to demonstrate how the industrialisation of the seascape and a decline in environmental quality could influence tourism's Gross Value Added or the broader economic resilience of the island.

The importance of unspoiled landscapes and dark skies to the visitor experience and emerging tourism markets, such as nature-based and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the potential impacts on a vital and expanding segment of the local economy. Furthermore, in a community with limited economic diversification, neglecting to assess the effects on tourism raises serious concerns regarding employment, local businesses, and community sustainability.

The application does not include a compliant Island Communities Impact Assessment, resulting in an unaddressed evaluation of these economic vulnerabilities, as stipulated

under the Islands (Scotland) Act 2018. Policy-wise, the failure to demonstrate compliance with the National Planning Framework 4 is evident, particularly concerning economic impact and the necessity to illustrate a net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to assess the economic ramifications of the proposal.

In sum, the lack of a comprehensive evaluation of tourism impacts, the failure to consider environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This undermines any robust evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the standards of sustainable development when evaluated against statutory duties, national policy, and evidential criteria. This application mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential foundation for determination is lacking in this application. There are notable deficiencies in baseline data, the use of an undefined design envelope, dependence on unspecified mitigation measures, and the exclusion of crucial impact pathways, including those related to nocturnal wildlife, onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Furthermore, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment contravenes the statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a substantial omission. These shortcomings obstruct the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal contradicts National Planning Framework 4, as it fails to protect biodiversity, natural environments, and cultural heritage, does not demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, masking potential repercussions for peatlands, carbon balance, habitats, and crofting land.

There are uncertainties and potentially significant risks to the environment. Assessments concerning marine ecology, seabirds, protected species, and marine

mammals are both incomplete and, in certain instances, inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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 connections, and impacts on tourism represent permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

Our valued wild lands are being industrialised to profit the few.

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: 868DC51C

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and related documentation, highlighting several deficiencies related to planning, environmental concerns, cultural aspects, and procedural matters. The development is set to take place 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 application lacks a sufficient evidential basis necessary for a lawful determination. There is critical missing environmental data, while the baseline information provided is limited and inconsistent. Furthermore, important aspects of the proposal remain undefined. The flexible design framework used hinders a clear understanding of likely significant effects. Additionally, the application relies on mitigation measures that have not yet been specified, making it impossible to assess their effectiveness. Consequently, the documentation does not allow for a complete or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are significant policy conflicts apparent in the application. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal fails to demonstrate compliance with national requirements that protect biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests needed for consent and undermine the competent authority's ability to conclude that the development is acceptable from a policy perspective.

The scale of this proposal is unprecedented in the area, with large turbines positioned near the shoreline. This raises substantial concerns about landscape capacity, visual dominance, and environmental impact. The lack of adequate information, the reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policies indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application exhibits significant evidential deficiencies, highlighted by gaps in baseline data, limitations in methodology, and an overreliance on assumptions rather

than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly in instances where negligible or non-significant effects are claimed without robust supporting data. The lack of adequate information hinders a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that fails to align with statutory requirements.

Moreover, the proposal does not adequately demonstrate compliance with National Planning Framework 4. The requirements related to biodiversity protection and environmental integrity cannot be satisfied as the assessment does not illustrate that impacts have been thoroughly examined or that necessary safeguards are established. The application seeks consent based on a reliance on unarticulated mitigation measures, monitoring strategies, and management plans that remain undefined. This approach results in an evaluation that is procedurally unacceptable, as it conflicts with the objectives of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly determined before a decision is made.

The Environmental Impact Assessment Report is materially deficient and fails to deliver a full, transparent, or reliable account of the likely environmental effects associated with the proposal. The application's use of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, contributes to considerable uncertainty and hampers the consistent application of a worst-case scenario. This undermines the integrity of the assessment and precludes both the public and the competent authority from comprehending the true extent of environmental effects.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the deficiencies in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, ultimately leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and evidence-based assessment of alternatives, which is crucial under the Environmental Impact Assessment regime. Rather than presenting a reasoned comparison of viable alternatives based on their environmental impacts, it offers a narrative focused on the project's development. This narrative does not sufficiently show that the developer has adequately identified and evaluated less harmful options in favour of those that are more damaging.

There is a lack of transparent analysis concerning alternative offshore locations, various scales of development, and potential design configurations. Notably, the

application does not indicate that the developer has genuinely considered placing the turbines further offshore, an action that could mitigate visual, ecological, and coastal effects. Considering the sensitivity of the West Lewis coastline, the failure to address the importance of distance from shore in assessing impacts prevents a determination that the proposed site is the least damaging option available.

Moreover, the shortcomings extend to the routing of cables and the assessment of landfall sites, where there is inadequate evidence that alternative routes have been thoroughly examined to lessen impacts on sensitive receptors, including areas of cultural significance such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest a failure to apply mitigation by design, relying instead on post-design measures that may not be effective.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout planning, and infrastructure routing. This indicates a disregard for the established mitigation hierarchy, leaving the competent authority unable to ascertain whether there are more appropriate and less harmful alternatives. Without a comprehensive assessment of alternatives, it is impossible to assert that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a significant omission, contributing to the overarching 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 lacks the necessary thoroughness and reliability to fully understand the ecological receptors in the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet the data collected is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, there is no solid evidential foundation for evaluating potential impacts.

One significant oversight pertains to otters, which are recognised as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. By failing to assess their core foraging range and behavioural patterns, it leaves the potential impacts of construction disturbance, noise, and increased human activity unexamined. This shortcoming diminishes any conclusions drawn regarding the absence of significant effects on this species.

Moreover, the evaluation of basking sharks reveals further issues, particularly due to an overreliance on aerial surveys which introduces considerable detection bias, especially

under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, particularly when compared with established land-based observations showing frequent use of these waters. The neglect to integrate or properly assess such data results in an inadequate baseline and undermines the reliability of the conclusions drawn.

These methodological flaws imply that the claims of negligible or non-significant effects stem more from assumptions than from solid evidence. The lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This leaves uncertainty surrounding the real scale of risk faced by marine species and their habitats.

From a regulatory standpoint, the application fails to adhere to the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not sufficiently identify or assess protected species. The uncertainty generated prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, it is not lawful to grant consent.

In summary, the combination of inadequate baseline data, flawed methodologies, and unsubstantiated conclusions culminates in an unreliable assessment. These shortcomings impede a rigorous evaluation of impacts on marine ecology and protected species and lead to the overarching conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn lack support from the evidence presented. Furthermore, the assessment does not adequately establish that seabirds associated with protected sites, like the Lewis Peatlands and St Kilda, will be unaffected. It inadequately accounts for the significance of these feeding grounds, and reliance on modelling approaches injects uncertainty, particularly concerning species experiencing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to understate mortality, especially where baseline data is lacking and behavioural responses are not

fully understood.

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

From a regulatory viewpoint, the application fails to meet the evidential threshold needed to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling weaknesses, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent. Additionally, the identified deficiencies signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely impacted positions the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline should be recognised as a living cultural landscape where environment, language, tradition, and community are interwoven. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach by treating heritage as isolated, static assets, ignoring their ongoing social, cultural, and spiritual functions within the community.

Culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are active places of burial and spiritual practice. Nonetheless, these locations have been mischaracterised as static features, with the assessment failing to consider their continued use and the development's impact on their settings. This oversight leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment disregards intangible cultural heritage, including the Gaelic language and traditions, along with 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 evaluation, representing a significant gap. Without incorporating these factors, the true cultural impact of the development cannot be adequately understood.

The absence of meaningful engagement with the Gaelic-speaking population, who possess a distinct cultural identity and characteristics of an Indigenous People, raises serious concerns about community rights. No process of Free, Prior and Informed Consent has been undertaken, undermining the legitimacy of the assessment and violating established principles of participation regarding decisions that affect cultural and environmental interests.

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

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

Collectively, these failures to assess living heritage, intangible cultural value, community rights, and statutory obligations lead to a significant evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for determining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding social impacts, health, and wellbeing due to the lack of transparency in its assessment. Although a Social Impact Assessment was commissioned by the developer, including focus groups with local residents, the complete report remains unpublished. This absence of information creates a substantial evidential gap, obstructing both public understanding and the competent authority's evaluation of social risks identified by the developer's research.

Available summaries reveal that residents are currently facing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These impacts have been derived from direct engagement and should not be regarded as speculative. However, the lack of disclosure concerning the full assessment hinders adequate scrutiny of these findings and restricts the determination of their significance during the decision-making process.

Moreover, there are indications that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s findings. Nevertheless, these impacts have not been properly considered in the main application nor given the appropriate weight they deserve. The decision to withhold the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning may be jeopardised. The failure to provide the complete dataset means the application does not present a thorough evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not illustrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid adverse effects; however, the evidence available indicates existing negative impacts that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be substantiated.

The implications of these procedural shortcomings are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application and signifies a failure to meet the evidential standards set forth by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and untrustworthy. This situation hampers lawful determination and reinforces the conclusion that the application is unsupported by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding the seascape, landscape, and visual impacts is critically inadequate and fails to capture the true extent of change alongside the sensitivity of the environment. The character of the West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped landscape, and a pronounced sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish a continuous industrial presence, fundamentally transforming this character and resulting in a permanent alteration to the landscape.

Moreover, the application does not sufficiently portray the magnitude of the anticipated visual change. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This development would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and landscapes of high value. This raises concerns that the magnitude of visual impact has been underestimated, thus compromising the reliability

of the assessment.

Furthermore, there is a notable deficiency in the evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that is visually and spatially linked to the Atlantic horizon. However, the assessment treats these sites as separate entities rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The proposed industrialisation of the seascape threatens to sever these connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This represents not merely a visual impact but a wider cultural and spatial detriment that has not been adequately accounted for in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural spaces and historic assets. The anticipated scale of change is fundamentally incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines claims of compliance with relevant policy.

It is evident that the identified impacts cannot be satisfactorily mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and inescapable. The resultant transformation is thus not something that can be moderated to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a dependable evaluation and strongly suggest that the proposal is incompatible with the protection of this important 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 assessment regarding the impacts on fisheries and marine life is inadequate and fails to present a thorough evaluation of both ecological and socio-economic consequences. The waters along the West Lewis coast are home to a diverse marine ecosystem and a vibrant fishing industry. However, the application does not adequately demonstrate how these activities and habitats can be preserved or maintained without significant disruption.

A notable concern is the presumption that fishing activities can simply be shifted without repercussions. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can handle increased pressure. This gap is crucial, as the risk of overfishing in other areas could arise, potentially leading to broader economic ramifications for the local fishing fleet. Without a clear, evidence-based assessment, understanding the effects on fisheries and livelihoods remains incomplete.

Furthermore, the proposal presents significant risks to marine species, especially due to the underwater noise produced during construction. The use of high-energy hammer piling for extended durations is expected to create disturbances over considerable distances, impacting species such as dolphins. The predicted disruption to a large segment of the local bottlenose dolphin population raises important issues, yet the application minimizes the seriousness of these effects without adequate supporting evidence.

There is also a striking inconsistency within the application, as it acknowledges the necessity of licences for any harm to European Protected Species, while simultaneously describing those impacts as negligible. This contradiction undermines the trustworthiness of the assessment and raises issues related to adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal permission.

Additionally, the assessment neglects to address cumulative impacts that arise from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. In the absence of a thorough evaluation of these combined effects, it is impossible to ascertain the overall consequences for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can exist alongside current marine users or avoid unacceptable consequences for marine biodiversity, which hinders the conclusion that the proposal embodies sustainable development.

When considered as a whole, the lack of evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment both incomplete and unreliable. These shortcomings impede a thorough evaluation of the repercussions for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly lacking and does not fully address the impacts stemming from what constitutes a single integrated project. The interconnection between the offshore turbines and the onshore works is clear, yet these elements are evaluated in isolation, leading to a fragmented analysis that diminishes the understanding of the overall environmental and socio-economic implications.

Included in the onshore components are cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly on Barvas Moor, which serves as an important carbon reservoir and an ecologically significant habitat. The application fails to provide a thorough assessment of these impacts, hindering a complete understanding of the

project's total environmental footprint.

By omitting or postponing the evaluation of onshore impacts, the application obstructs the proper assessment 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 effects on peatlands, habitats, and local communities.

Additionally, there are considerable risks to sensitive habitats, including machair systems and peatland environments, both of which are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant evidential gap concerning biodiversity protection.

The proposal further raises serious concerns regarding carbon balance. Disturbance of peatland results in the release of stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy initiatives. The application inadequately addresses this concern and fails to show that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure across active croft land presents potential conflicts with existing land use and legal rights. There is no evidence within the application that necessary consents or processes have been initiated, which raises doubts about the feasibility and lawful execution of the proposal.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The exceptionally dark skies along the West Lewis coastline are integral to the area's environmental quality, cultural identity, and tourism value. The proposal includes the introduction of permanent red aviation lighting, which would be visible over considerable distances, thereby creating a continuous and intrusive "wall of light" across the western horizon that fundamentally alters the night-time environment.

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

amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly significant in light of the importance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these impacts reflects a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is a critical lack of evaluation regarding the effects 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 an increased risk of collision. The absence of a lighting impact assessment or a phototaxis study means that the application does not adequately assess how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activity or related risks. Kittiwakes, for example, may forage or migrate at night and are similarly vulnerable to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data results in a crucial gap in understanding the ecological impacts of the proposal.

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

In terms of policy, this omission contravenes the National Planning Framework 4, particularly regarding the protection of natural places and the maintenance of environmental quality. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is a fundamental aspect of the environment.

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

TOURISM

The evaluation of tourism impacts in the application is severely lacking, failing to adequately consider the economic and social repercussions for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's stunning wild coastline, nearly untouched landscapes, dark skies, and its 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, their behaviour, or the overall economic

contributions made by tourism.

Significantly, tourism has experienced remarkable growth, escalating from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and the degradation of environmental quality could impact Tourism Gross Value Added or the broader economic resilience of the area. Without such vital analysis, it remains impossible to ascertain whether the proposed development would yield a net economic benefit or adversely affect this established and expanding sector.

Additionally, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to the overall visitor experience. This disregard for an essential element of the tourism sector is further exacerbated by the absence of a Dark Skies Assessment, creating a substantial gap in the understanding of impacts on a recognised and burgeoning segment of the local economy, such as nature-based tourism and astro-tourism.

The implications of this oversight extend beyond tourism, as the island community has limited economic diversification. The failure to evaluate the impacts on tourism can have broader repercussions for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been addressed, contravening the requirements outlined in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. It conflicts with strategic objectives that prioritise tourism as a vital growth sector and fails to present sufficient evidence for the competent authority to assess the economic implications of the proposal.

Collectively, the lack of quantification of tourism impacts, the insufficient consideration of environmental factors that drive visitor behaviour, and the disregard for the island's economic dependence on tourism culminate in a significant evidential gap. This shortfall 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 embodies a significant failure to meet the criteria for sustainable development as outlined in 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, wherein the unacceptable level of industrialisation was highlighted. This current application, however, is presented under an enhanced policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps in baseline data raise concerns about the reliability of the evidential basis for determination. The application relies on an undefined design envelope and mitigation measures that are not specified, while also neglecting to address key impact pathways, including those related to nocturnal wildlife, the full scope of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is insufficient, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment violates statutory obligations under the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a serious omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

Furthermore, this proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural areas, or cultural heritage, nor does it demonstrate that the impacts on health and wellbeing are acceptable. Additionally, there is no evidence of a net economic benefit, as the absence of tourism impact modelling leaves significant uncertainties. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, thereby obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain unclear and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and at times inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent based on these grounds or exercise relevant regulatory provisions to mandate the submission of the necessary missing information.

For these reasons, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is refused in its entirety.

Additional Comments

I believe large companies should not be allowed to destroy our views, wildlife and detract from our peaceful Island way of life for their own profit while not improving our lot in any way.

The only way I believe we should allow this to go ahead is if the island homes should be supplied with free electricity and let them export whatever is leftover.

I for one would be happy to look at the windmills if they were providing me with a warm home at no cost.

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: F343814F

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

Dear Sir/Madam

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

The application lacks a sufficient evidential basis for a lawful decision. Essential environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain undefined. The adoption of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, there are evident and substantial conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly relate to the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine the proposal's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines located in close proximity to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. When considered collectively, the lack of sufficient information, dependence on undefined mitigation, evidential deficiencies, and clear non-compliance with policy reveal that the application is incomplete and cannot support a lawful determination. Under these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies and fails to deliver a full, transparent, or reliable account of the expected environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach compromises the integrity of the assessment, making it impossible for the public and competent authorities to fully understand the potential environmental impacts of the development, as the effects outlined may not accurately reflect what will ultimately be constructed.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be mitigated at a later date prevents a meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally inappropriate and contradicts the core objective 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 gaps, including inadequate baseline data, limitations in methodology, and an overreliance on assumptions instead of site-specific evidence. Such shortcomings lead to uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that conflicts with statutory requirements.

Consequently, the application fails to satisfy the evidential standard stipulated under the Habitats Regulations, which aims 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 compliance with National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are implemented.

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

ASSESSMENT OF ALTERNATIVES

The application proposes a development that lacks an adequate assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of viable alternatives

based on their environmental effects, it provides a narrative of project evolution. This method does not sufficiently show that the developer has identified, assessed, and selected less harmful options over more damaging ones.

There is a notable absence of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, which could reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the significant role of proximity to shore in determining impact mean that the lack of such analysis hinders any conclusion regarding whether the proposed siting is indeed the least damaging option.

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

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

From a policy standpoint, this shortcoming undermines compliance with National Planning Framework 4, particularly regarding the protection of natural environments, 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 adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The current application presents significant deficiencies in its assessment of marine ecology and protected species, particularly within the sensitive and biologically active marine environment of West Lewis. The methodologies employed lack the depth required to capture a comprehensive understanding of species presence, behaviour, and habitat use, leading to incomplete baseline data that undermines the reliability of the evaluation of potential impacts.

A notable gap in the assessment pertains to otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. This oversight means that critical aspects such as their core foraging range and behavioural patterns have not been appropriately

considered, leaving the assessment of potential construction disturbances, noise, and increased activity unexamined. Consequently, the conclusions drawn regarding the absence of significant effects on otters are fundamentally flawed.

Further issues arise in the assessment of basking sharks, where the reliance on aerial surveys introduces a significant detection bias, particularly in Atlantic conditions. This methodological approach risks underestimating the presence of basking sharks, especially when juxtaposed with well-established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data culminates in an incomplete baseline, casting doubt on the reliability of the conclusions reached.

The shortcomings in methodology lead to conclusions of negligible or non-significant effects being based more on assumptions than on robust evidence. Additionally, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. This generates uncertainty about the true extent of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set out by the Environmental Impact Assessment regime and the National Planning Framework 4, given that protected species have not been sufficiently identified or assessed. The uncertainty introduced by these deficiencies precludes the dismissal of adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions fundamentally undermines the assessment's reliability. These factors obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the argument that the application fails to present a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The assessment contains significant gaps in evidence, alongside internal inconsistencies that undermine its conclusions. Specifically, the west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already in decline, yet the application does not adequately demonstrate that these species will remain unaffected. Furthermore, the development is situated within key foraging areas and migratory pathways, but it does not sufficiently evaluate the implications of displacement, collision risk, or habitat loss.

A fundamental contradiction exists within the application, as the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is required only in instances where significant harm

is anticipated. This inconsistency raises concerns about the reliability of the assessment and indicates that the conclusions drawn are not substantiated by the supporting evidence. The assessment fails to provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and reliance on modelling approaches creates uncertainty, particularly for species facing severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly given the incompleteness of baseline data and the incomplete understanding of behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor introduces significant risk, effectively creating a barrier along a primary flight path for species travelling between the United Kingdom and Iceland. The application does not thoroughly assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations. Collectively, the deficiencies identified constitute 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 in direct conflict with national policy.

In conclusion, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed application fails to adequately assess the cultural heritage and community identity of the West Lewis coastline. This area is a living cultural landscape where environment, language, tradition, and community are interconnected. However, the assessment adopts a reductive perspective, viewing heritage merely as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual functions within the community.

One major oversight is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These locations are active places for burial and spiritual practice, yet they are mischaracterised as static features, neglecting their continued use and significance. This lack of understanding diminishes the evaluation of cultural effects and overlooks their integral role in community life.

Moreover, the assessment disregards intangible cultural heritage, such as the Gaelic language, local traditions, and the historical relationship between the community and the coastal environment. These elements are fundamental to the area's identity but have been completely omitted, which is a considerable shortcoming. The absence of these factors leads to an incomplete understanding of the cultural impacts of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, recognised as Indigenous People, has a unique cultural identity. Yet, no process of Free, Prior and Informed Consent has been implemented, which undermines the assessment's legitimacy and fails to adhere to established participation principles regarding decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack 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 obligations to evaluate the social, cultural, and economic impacts on the island community, resulting in an unlawful determination.

From a policy standpoint, these shortcomings place the proposal in direct contradiction to National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage and to acknowledge living cultural practices constitutes a significant departure from policy requirements.

In summary, the neglect of living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been sufficiently assessed, and the application lacks a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding the adequacy of the assessment of social impacts, health, and wellbeing. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents; however, the full report remains unpublished. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to evaluate the full scope of social risks identified by the developer's own research.

Residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, indicating they are not speculative in nature. Nonetheless, the absence of the full assessment restricts proper scrutiny of the findings and diminishes the opportunity to ascertain their significance in the decision-making process.

Moreover, evidence suggests that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this acknowledgement, such impacts have not been adequately addressed within the main application or assigned appropriate importance. The withholding of the complete Social Impact Assessment thus obscures the genuine human and social costs associated with the development.

This deficiency of transparency severely 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. The application fails to present a complete evidential basis necessary for assessing the balance between benefits and harm due to the lack of the full dataset.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid adverse effects; however, the available evidence points to existing negative impacts that have not been fully revealed. Without access to the full assessment, compliance with this policy remains unproven.

The procedural ramifications are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a significant omission in the application and fails to satisfy the evidential standards set by the Environmental Impact Assessment regime.

In summary, the combination of the non-disclosure of the full Social Impact Assessment and evidence of current adverse impacts renders the assessment incomplete and unreliable. This situation prevents a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline features an open Atlantic horizon, an undeveloped character, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a dominant industrial presence, fundamentally transforming this character and causing a permanent alteration to the landscape. The assessment presented fails to represent the scale of this visual change adequately, as the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, adversely impacting visual amenity and eroding the naturalness and remoteness of the area.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not effectively capture the most sensitive receptors or potential worst-case scenarios, particularly concerning significant cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, thereby undermining the assessment's reliability.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently explored. Notably, sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape context, which is visually and spatially linked to the Atlantic horizon. By treating these sites as isolated assets, the assessment neglects their interdependence, leading to an incomplete

evaluation of their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The extent of change threatens the safeguarding of landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the absence of a rigorous worst-case assessment calls into question any claims of policy compliance.

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

Overall, the assessment is inadequate in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. This deficiency is alarming, particularly given that the application depends on future mitigation and contingency measures, which are to be formulated post-consent. Such an approach does not allow for a thorough assessment of their adequacy or effectiveness.

The environmental context is crucial; the West Lewis coastline is home to clean coastal waters and significant habitats that are sensitive to sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate details on how these issues will be prevented, controlled, or monitored effectively.

Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty raises concerns about potential effects on marine species and habitats that have already been identified as vulnerable in the wider assessment.

The situation is further exacerbated by the lack of detailed emergency response

procedures. By postponing contingency planning until after consent has been granted, 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 capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, as the absence of such information renders a lawful determination unfeasible. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts significantly undermines the assessment. These deficiencies hinder 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 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 onshore infrastructure is incomplete and fails to fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interconnected, yet they are evaluated separately, which leads to a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The application includes significant onshore components, such as cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. However, the application does not provide a thorough assessment of these impacts, which prevents a comprehensive understanding of the project's overall environmental footprint.

There are serious risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application has not demonstrated that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This leads to a significant evidential gap concerning biodiversity protection.

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

From a policy standpoint, the failure to assess the project as a cohesive whole and to demonstrate adequate protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The lack of

evidence showing that impacts can be avoided or mitigated further undermines the application.

By excluding or postponing the assessment of onshore impacts, the application fails to allow for an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered in conjunction, yet the distinct evaluation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

In addition, the proposal raises alarms regarding carbon balance. The disturbance of peatland leads to the release of stored carbon, potentially resulting in 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.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it does not include an evaluation of dark skies and nocturnal wildlife. The West Lewis coastline is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal would introduce permanent red aviation lighting that would be visible over considerable distances, creating a continuous and intrusive "wall of light" effect on the western horizon, thereby fundamentally altering the night-time environment.

Furthermore, the application fails to consider the lighting's impact on visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the region's identity and the emerging tourism sector, including astro-tourism. As a result, there is a substantial gap in the landscape and environmental assessment.

Equally important is the lack of evaluation concerning nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not incorporate any assessment of lighting impact or conduct a phototaxis study to examine the potential effects of aviation lighting on these species and the associated mortality risks.

The situation is exacerbated by the use of daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or related risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, a threat that has not been evaluated. The absence of site-specific

night-time data represents a critical gap in understanding the ecological impacts.

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

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

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

TOURISM

The evaluation of the tourism impacts within the application is lacking and does not adequately address the economic and social ramifications for an essential sector of the Isle of Lewis. The area's wild coastline, near-pristine landscapes, dark skies, and remoteness are fundamental to tourism, which has seen a notable rise, growing from £65 million in 2017 to over £81.5 million. This growth has facilitated the creation of more than 1,000 jobs, constituting up to 16% of the island's economy. Despite these figures, there is no analysis presented on how large-scale offshore infrastructure could influence visitor numbers, behaviours, or overall economic contributions.

The application also neglects to consider the significance of environmental quality, which is vital for tourism, particularly regarding unspoiled landscapes and dark skies that enhance visitor experiences and attract emerging markets such as nature-based and astro-tourism. The lack of a Dark Skies Assessment further highlights this shortcoming, resulting in a considerable gap in understanding the impacts on a growing segment of the local economy.

In an island community where economic diversification is limited, the failure to assess tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been thoroughly evaluated, as mandated by 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 to show a net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for the competent authority to assess the economic implications of the proposal.

In summary, the absence of a thorough quantification of tourism impacts, a disregard for the environmental drivers influencing visitor behaviour, and a lack of consideration for the island's economic dependency lead to 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 fundamentally fails to meet the criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It brings to light the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a major concern. This new application is presented under an even stronger policy framework, which now emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for the proposal, marked by critical gaps in baseline data and the ongoing use of an undefined design envelope. The reliance on unspecified mitigation measures is concerning, as is the omission of key impact pathways related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a thorough understanding of the likely significant effects or residual impacts of the development.

Procedurally, the application demonstrates clear shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment represents a material omission. These issues hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

Moreover, the proposal contradicts the National Planning Framework 4. It does not adequately protect biodiversity, natural places, or cultural heritage and fails to demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further undermines claims of net economic benefit. The cumulative effects of both offshore and onshore elements have not been properly assessed, obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds the environmental risks associated with the proposal. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and hindering the ability to lawfully conclude that impacts are acceptable.

This proposal would lead to significant 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 detrimental effects on tourism are permanent impacts that cannot be adequately mitigated.

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

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

Additional Comments

I believe this windfarm would change the look of the island, the impact on wildlife would be immense in a place that allows freedom of wildlife and no big built up areas to impact them negatively. Tourism would dramatically decrease therefore putting small business out of business. In a place like this you learn to adapt, but to build this windfarm would be a blight on the landscape, a huge concern for wildlife, birds, whales etc and detrimental to the population as a whole with no benefits whatsoever.

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: E08BE607

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The concerns regarding this proposal stem from its scale, proximity, and design, which raise fundamental issues about its alignment with statutory requirements, national policy, and sustainable development principles.

The application presents significant shortcomings, as it lacks an adequate evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is limited and inconsistent. Moreover, key elements of the proposal remain undefined. The flexible design framework obscures a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

Substantive policy conflicts are evident, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly relevant to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent, undermining the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposed development is unprecedented for this location, with large turbines planned in close proximity to the shoreline. This introduces significant concerns related to landscape capacity, visual dominance, and overall environmental impact. When considering the absence of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The 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 assessment of alternatives presented in the application is fundamentally inadequate and fails to meet the statutory obligations set forth by the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned evaluation of realistic alternatives based on environmental impacts, the application provides a narrative detailing the evolution of the project. This method does not establish that less harmful options have been adequately identified, evaluated, and preferred over more damaging alternatives.

There is a clear lack of transparent, evidence-based comparisons concerning offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has seriously considered the potential for placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The sensitivity of the West Lewis coastline and the crucial role of proximity to shore in determining the extent of impact make the absence of such analysis significant. This void prevents any conclusion that the proposed siting is indeed the least damaging option available.

The issues extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence indicating that alternative routes have been adequately considered to avoid or lessen impacts on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid such impacts, combined with the absence of comparative analysis, suggests that mitigation by design has not been adequately applied, resulting instead in a reliance on post-design measures to address potential harm.

Consequently, the application does not demonstrate that environmental harm has been sufficiently minimised through careful site selection, layout, and the routing of infrastructure. This is indicative of a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. In the absence of a comprehensive assessment of alternatives, it cannot be concluded that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this shortcoming compromises adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community well-being. The lack of a structured and comparative assessment is a significant omission that contributes to the overall determination that the application has not undergone adequate evaluation and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One significant shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess the active utilisation of coastal areas by otters for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate evaluation of

the potential impacts of construction disturbance, noise, and increased activity. This oversight undermines any assertions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant deficiencies, rendering it unreliable. It fails to demonstrate adequately, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis will not be adversely affected. Many of these species are already in decline, and the development is situated within crucial foraging areas and migratory pathways. The implications of displacement, collision risk, and habitat loss are not rigorously evaluated, which undermines the overall conclusions of the assessment.

A key inconsistency within the application arises from the developer's conclusion of no significant adverse effects, which contradicts the advancement of a Habitats Regulations derogation case, typically necessitated only in instances where significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment, suggesting that the conclusions drawn lack adequate supporting

evidence. The assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds has not been fully considered, and reliance on modelling approaches introduces uncertainty, particularly for species experiencing severe declines, including Kittiwakes and Fulmars. Methodologies employed are likely to underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within an established migratory corridor poses an additional, significant risk, as it creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not sufficiently 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 fails to meet the evidential threshold required to ascertain no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, in conjunction with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, which impedes a lawful conclusion in favour of consent. Furthermore, the identified deficiencies illustrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to substantiate that internationally significant seabird populations will remain unaffected directly conflicts with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to recognise the West Lewis coastline as a living cultural landscape, where the connections between environment, language, tradition, and community are integral. It adopts a reductive perspective, viewing heritage merely as isolated and static entities, rather than acknowledging their continuous social, cultural, and spiritual significance within the community.

A notable shortcoming is evident in the treatment of culturally significant sites, specifically the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, the assessment mischaracterises them as static features, neglecting their ongoing use, meaning, and the implications of development on their context. This oversight leads to an incomplete understanding of the cultural ramifications and disregards their importance to community life.

Moreover, the assessment does not address intangible cultural heritage elements, such as the Gaelic language and traditions, nor does it acknowledge the longstanding

relationship between the community and the coastal environment. These factors are vital to the area's identity but are completely omitted from the evaluation, representing a considerable lapse. The cultural impact of the development cannot be adequately comprehended without these considerations.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has a unique cultural identity, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation in matters affecting cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment is a critical procedural failure. This assessment is a statutory requirement under the Islands (Scotland) Act 2018. Its absence means that the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic effects on the island community, which alone obstructs lawful determination.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, particularly regarding the preservation of historic assets and sites. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, clearly deviates from policy stipulations.

Ultimately, the collective failure to evaluate living heritage, intangible cultural value, community rights, and statutory obligations culminates in a significant evidential gap. The cultural effects of the development have not been sufficiently assessed, and the application lacks an adequate foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding social impacts, health, and wellbeing is a critical issue that undermines the evaluation process. A Social Impact Assessment was commissioned by the developer and involved focus groups with local residents; however, the full report has not been made public. This significant gap in evidence inhibits both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's own findings.

Evidence suggests that local residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects stem from direct engagement with the community and are therefore based on actual experiences rather than speculation. Yet, the omission of the full assessment stymies proper scrutiny of these findings and hampers the assessment of their implications within the decision-making framework.

Additionally, there are indications that the proposal is viewed as a threat to community identity and cohesion, with the term "cultural loss" featured in the developer's findings.

Nonetheless, these impacts have not been adequately included in the main application or given the necessary consideration. By withholding the complete Social Impact Assessment, the true human and social costs of the development remain obscured.

This lack of transparency has repercussions for the Environmental Impact Assessment process. It is vital to fully understand the social, economic, and health impacts associated with developments of this magnitude, especially when community character and functionality are at stake. Without the complete dataset, the application does not present a comprehensive evidential basis to properly weigh the benefits against the potential harms.

From a policy standpoint, the application is insufficient in demonstrating alignment with National Planning Framework 4 concerning health and wellbeing. Development initiatives are required to foster positive health outcomes and mitigate harm; however, the existing evidence reveals adverse effects that have not been fully disclosed. Without the complete assessment, it is impossible to ascertain compliance with these policy requirements.

The procedural ramifications are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a substantial omission in the application, failing to meet the evidential standards established by the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, results in an assessment that is both incomplete and unreliable. This circumstance prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

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 West Lewis coastline is home to clean coastal waters and important habitats that are particularly vulnerable to sediment disturbance and contamination. 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 potential environmental effects.

The application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified

mitigation and contingency measures to be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures is troubling, especially given the sensitive nature of the receiving environment.

There are acknowledged risks such as sediment mobilisation and accidental chemical or oil spills, but the application fails to offer sufficient detail on how these risks will be prevented, controlled, or monitored. Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these potential impacts. This uncertainty also extends to the likely effects on marine species and habitats identified as sensitive in the broader assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application impedes the assessment of whether appropriate safeguards are in place to manage pollution events. This introduces procedural risk and undermines the capacity of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and the related mitigation must be evaluated prior to consent; without such information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Collectively, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts make the assessment materially deficient. These shortcomings impede a thorough evaluation of construction and pollution risks and underscore the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life associated with the application is insufficient and does not provide a robust evaluation of ecological or socio-economic impacts. A critical concern is the flawed assumption that fishing activity can be displaced without consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This oversight is significant as it risks overfishing in other areas and could lead to broader economic repercussions for the local fleet. The lack of a clear and evidence-based assessment means that the impacts on fisheries and livelihoods remain poorly understood.

Moreover, the proposal introduces considerable 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 expected to disturb a wide range of marine life, including species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes the significance of these effects without providing sufficient supporting evidence.

Inconsistencies within the application are also notable. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation. Furthermore, the assessment does not take into account cumulative impacts that may arise from various pressures, including habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions cannot be properly determined.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which prevents any conclusion that the proposal reflects sustainable development. In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively render the assessment incomplete and unreliable. These deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is significantly incomplete, failing to acknowledge the full extent of the impacts from what constitutes a single integrated project. The offshore turbines and onshore works are fundamentally interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects associated with the project.

Onshore elements include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, notably within Barvas Moor, which is recognised as a critical carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By not assessing onshore impacts, the application obstructs the ability to evaluate cumulative effects adequately. The Environmental Impact Assessment process mandates that all components of a project be considered in tandem. However, the

distinct separation of offshore and onshore elements results in an incomplete understanding of their combined impacts on peatlands, habitats, and local communities.

Moreover, there are 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 or that appropriate avoidance measures have been established. This leaves a notable evidential gap concerning biodiversity protection.

Concerns also arise regarding the project's carbon balance. Disturbance of peatland releases stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application fails to adequately address this issue or to show that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is insufficient evidence in the application to confirm that the necessary consents or processes have been initiated, raising significant questions about the project's deliverability and lawful execution.

From a policy perspective, the lack of a holistic assessment of the project and the failure to demonstrate adequate protection of peatlands, habitats, and land use interests 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.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an evaluation of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that would create an intrusive “wall of light” effect visible over long distances, 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. Given the importance of dark skies for the area's identity and for emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. It indicates a clear gap in the overall landscape and environmental assessment.

Additionally, there is no consideration of the effects on nocturnal wildlife. Species like

Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The absence of any lighting impact assessment or phototaxis study means the application does not consider how aviation lighting may affect these species or contribute to higher mortality rates.

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

Without an assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites would be adversely impacted. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and preventing a lawful determination.

From a policy perspective, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also undermine the broader evaluation of landscape and seascape impacts, as night-time character is an integral part of the environment.

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

TOURISM

The application has significant deficiencies in assessing tourism impacts, failing to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. In an area where tourism relies heavily on its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, this oversight is critical. The application acknowledges that 86% of visitors are attracted by the scenery but does not provide any quantified assessment of how large-scale offshore infrastructure may influence visitor numbers, behaviour, or overall economic contributions.

Tourism on the Isle of Lewis has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application neglects to model the effects of seascape industrialisation and loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this analysis, it remains unclear whether the development will yield a net economic benefit or jeopardise a well-established and expanding sector.

Furthermore, the assessment fails to recognise the significance of environmental quality in enhancing tourism, including the vital role of unspoiled landscapes and dark

skies in shaping visitor experiences and supporting emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, leading to a critical gap in understanding the implications for a recognised and growing segment of the local economy.

In an island community that has limited economic diversification, the failure to assess tourism impacts has broader ramifications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been adequately evaluated, contrary to the requirements of the Islands (Scotland) Act 2018.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not comply.

Critical deficiencies are evident in the evidential basis for assessment. The application lacks comprehensive baseline data, utilises an undefined design envelope, and relies on unspecified mitigation measures. Furthermore, it neglects vital impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is insufficient, preventing a thorough understanding of potential significant effects or residual impacts.

Additionally, procedural shortcomings are apparent. The failure to provide a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the incomplete Social Impact Assessment constitutes a serious omission. These lapses hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it prove that health and wellbeing impacts are acceptable. The lack of tourism impact modelling means that net economic benefit cannot be evidenced. Moreover, the cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and possibly significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making it impossible to lawfully conclude that impacts are acceptable.

The proposal would lead to substantial and irreversible changes to a sensitive landscape. Industrialisation along the Atlantic-facing coastline, the degradation of dark skies, disruption to cultural and visual relationships, and negative impacts on tourism represent permanent alterations that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, policy inconsistencies, and unresolved environmental risks obstructs the possibility of a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or require the submission of the missing information through relevant regulatory mechanisms.

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

Additional Comments

This will have a huge impact for all the above reasons, with the damage being irreversible.

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: BB1D263D

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The proposal's scale, design, and proximity to the shoreline raise critical concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not underpinned by robust evidence.

There are notable and substantial conflicts with existing policy. 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 wellbeing. It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests necessary for consent, thereby undermining the competent authority's ability to conclude that the development meets acceptable policy standards.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual impact, and environmental repercussions. With large turbines situated close to the shoreline, the application's deficiencies—including insufficient information, reliance on undefined mitigation strategies, and evident policy non-compliance—render it incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a full, transparent, and reliable evaluation of the likely environmental effects of the proposal. A flexible Project Design Envelope is employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and hampers the ability to apply a worst-case scenario consistently. Such an approach undermines the integrity of the assessment, meaning that the impacts presented may not truly reflect the development that will ultimately be constructed. Consequently, both the public and the competent authority are left without a clear understanding of the actual extent of the environmental effects.

Furthermore, the application relies extensively on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Consent is sought on the premise that any environmental harm will be mitigated at a later stage. This deferral prevents any meaningful evaluation of the effectiveness of those measures and hinders the assessment of residual impacts. It is procedurally unacceptable to postpone key information until post-consent stages, as this contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly established before determination.

In addition to the above issues, there are notable evidential deficiencies within the assessment, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, creating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate compliance with National Planning Framework 4, as it fails to adequately assess impacts or ensure that appropriate safeguards are in place for biodiversity protection and environmental integrity.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and significant gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a well-informed determination based on the information presented.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives in the application is fundamentally inadequate and fails to satisfy the statutory requirements mandated by the Environmental Impact

Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental impacts, the submission provides merely a narrative of the project's development. This methodology does not demonstrate that less harmful options have been sufficiently identified, assessed, and selected over more damaging alternatives.

A clear and evidence-driven comparison of different offshore locations, varying development scales, or design configurations is absent. Notably, the application does not prove that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact, the lack of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient documentation that alternative routes have been adequately examined to avoid or mitigate effects on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis suggest that there has been no application of mitigation by design, instead relying heavily on measures to mitigate post-design.

Consequently, the application does not establish that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This represents a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it is impossible to determine that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a significant shortcoming that contributes to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

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

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

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

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the assessment approaches cultural heritage in a reductive manner, viewing it as a collection of isolated, static assets and neglecting their ongoing social, cultural, and spiritual significance within the community.

Notably, the evaluation does not adequately consider culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are active sites of burial and

spiritual practice, yet the assessment regards them as mere static features, disregarding their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural ramifications and overlooks their importance in community life.

Additionally, the intangible aspects of cultural heritage, including the Gaelic language, traditions, and the enduring bond between the community and the coastal environment, are not taken into account. These elements are vital to the area's identity, yet they are conspicuously missing from the assessment, resulting in a significant oversight. Without acknowledging these factors, the true cultural impact of the development remains unexamined.

There are pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity and the characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of genuine engagement calls into question the validity of the assessment and neglects essential principles of participation in matters that affect cultural and environmental interests.

A significant 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 assess the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings conflict directly with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The oversight of both tangible and intangible heritage, along with the failure to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In conclusion, the neglect to assess living heritage, intangible cultural values, community rights, and statutory requirements results in a significant evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, leaving the application without a solid foundation for understanding the genuine cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful appraisal. The developer has undertaken a Social Impact Assessment that included focus groups with local residents; however, the comprehensive report remains unpublished. This creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the full range of social risks identified in the developer's own research.

Summaries available to the public suggest that residents are currently facing

measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These concerns stem from direct engagement, and thus are not merely speculative. The lack of disclosure regarding the complete assessment limits scrutiny of its findings and hampers the evaluation of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these implications have not been properly integrated into the main application or afforded the appropriate consideration. By withholding the full Social Impact Assessment, the developer obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. An understanding of social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functionality are at stake. The failure to provide the complete data set results in the application lacking a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence available indicates pre-existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

The procedural consequences of this situation are significant. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This omission within the application represents a failure to meet the evidential standards required by 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 obstructs a lawful determination and supports the assertion that the application lacks sufficient 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 proposal to introduce large-scale turbines near the shoreline poses a significant risk of transforming this landscape into an industrial setting, fundamentally altering its character and resulting in a permanent and irreversible change. The assessment of seascape, landscape, and visual impacts associated with this application is severely deficient, failing to accurately reflect both the scale of change and the sensitivity of the receiving environment.

There is an inadequate representation of the visual impact stemming from the turbines' size and proximity to residential areas, historic sites, and popular coastal locations. This is likely to dominate views, directly affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment neglects to convey the significance of these impacts within such a sensitive landscape context.

Furthermore, there are methodological flaws in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly regarding cultural heritage sites and valued landscapes. This raises concerns about the potential understatement of visual impacts, which undermines the overall reliability of the assessment.

The evaluation also fails to account for the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their landscape setting, with visual and spatial relationships that connect them to the Atlantic horizon. The application treats these heritage assets as isolated rather than recognising their interdependence, leading to an incomplete analysis of the impact on their setting and cultural importance.

Industrialisation of the seascape would disrupt these relationships, altering the experience of heritage assets and their connection to the natural horizon. This is not merely a visual issue but represents a broader cultural and spatial harm that has not been adequately assessed.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of change proposed is incompatible with the necessary safeguarding of landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy requirements.

Moreover, it is evident that the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence will be dominant and unavoidable, resulting in a fundamental and permanent change that cannot be reduced to an acceptable level through any proposed mitigation measures.

In summary, 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 hinder a dependable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents 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 proposal raises significant concerns regarding the assessment of fisheries and marine life, which appears insufficient and lacks a comprehensive evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast host a diverse marine ecosystem alongside an active fishing industry. However, the

application fails to adequately demonstrate how these habitats and uses can be protected or maintained without significant disruption.

A critical issue is the assumption that fishing activity can be displaced without repercussions. There is no evidence provided that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This notable omission is consequential, as such displacement threatens to exacerbate overfishing in other areas and could lead to broader economic implications for the local fishing fleet. Without a thorough and evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal presents considerable risks to marine species, notably through underwater noise produced during construction activities. The use of high-energy hammer piling over extended periods is likely to create disturbances that affect marine life over large distances, with particular concern for species like dolphins. The projected disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application appears to downplay the importance of these effects, lacking adequate supporting evidence.

The application exhibits a clear inconsistency by acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal authorisation.

Furthermore, the assessment does not adequately address cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these interconnected effects, determining the overall impact on marine ecosystems and socio-economic conditions is unfeasible.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is not complete and does not adequately consider the impacts of this integrated project. The offshore turbines and the onshore works are interconnected, yet they are evaluated separately, leading to a disjointed

approach that hides the true scale of environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, a substation near Stornoway, and access infrastructure through sensitive landscapes. These constructions involve excavating deep peat areas, particularly in Barvas Moor, which is crucial for carbon storage and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all components of a project to be evaluated together, but the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully appreciated.

There are notable risks to sensitive habitats, including machair systems and peatland areas that have policy protection. The application does not prove that the impacts on these habitats have been properly assessed or that suitable avoidance measures have been implemented. This creates a significant gap in evidence regarding biodiversity protection.

The proposal also raises issues related to carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt, contradicting renewable energy goals. The application does not sufficiently address this concern or show that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide evidence that necessary consents or processes have been started, which raises doubts about its deliverability and lawful execution.

From a policy standpoint, the failure to assess the project as a unified 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 weakens the application further.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing an evaluation of dark skies and nocturnal wildlife, which represents a significant oversight. The coastline of West Lewis features exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposal includes permanent red aviation lighting that would be visible over long distances, creating an intrusive “wall of light” effect across the

western horizon, fundamentally changing the night-time environment.

The application fails to consider how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly important given the significance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. As a result, there is a substantial gap in the overall landscape and environmental assessment.

More importantly, the proposal does not assess the effects of this lighting on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are sensitive to artificial light due to phototaxis, which can cause disorientation and raise collision risks. The absence of a lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species or the risk of increased mortality are not evaluated.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not adequately reflect nocturnal activity and its associated risks. Species like Kittiwakes that may forage or migrate at night are also susceptible to disorientation from artificial lighting, yet this risk has not been assessed. Without site-specific night-time data, there is a crucial gap in understanding the ecological impacts.

Determining whether protected species or designated sites could be negatively affected is impossible without an assessment of nocturnal impacts. The application does not meet the evidential standard required to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also weakens the comprehensive assessment of landscape and seascape impacts since the character of night-time environments is a critical component of the ecosystem.

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

TOURISM

The evaluation of tourism impacts within the application is fundamentally lacking and does not adequately address the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the island's wild coastline, near-pristine landscapes, dark skies, and unique sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment regarding how the introduction of large-scale offshore infrastructure may influence visitor numbers, behaviour, or the overall economic contributions of this sector.

The tourism industry has seen considerable growth, increasing from £65 million in 2017 to over £81.5 million, and now supports more than 1,000 jobs while accounting for up to 16% of the island's economy. However, the application does not model how the anticipated industrialisation of the seascape and a decline in environmental quality could impact Tourism Gross Value Added or the resilience of the broader economy. Without such crucial analysis, it remains uncertain whether this development would yield a net economic benefit or jeopardise a flourishing sector.

Moreover, the assessment neglects to recognise the significance of environmental quality in promoting tourism. The importance of unspoiled landscapes and dark skies to the visitor experience, particularly concerning emerging sectors like nature-based tourism and astro-tourism, is left unexamined. The lack of a Dark Skies Assessment intensifies this shortcoming, resulting in a significant gap in understanding the potential impacts on this recognised and expanding segment of the local economy.

In an island community characterised by limited economic diversity, the failure to evaluate tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been scrutinised as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly concerning economic impacts and the necessity of showcasing net benefits. It also contradicts strategic objectives that identify tourism as a priority growth sector and lacks the necessary evidence to enable the competent authority to assess the economic repercussions of the proposal effectively.

When considered collectively, the shortcomings 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 gap hampers a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as defined by statutory obligations, national policies, and evidential standards. It echoes the significant issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. This current application is presented under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of local communities.

There are substantial deficiencies in the evidential basis for the proposal, including critical gaps in baseline data and the utilisation of an undefined design envelope. The

application relies on unspecified mitigation measures and fails to consider essential impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, hindering the ability to fully comprehend likely significant effects or residual impacts.

Furthermore, the application contains notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set out in the Islands (Scotland) Act 2018, and the failure to present a complete Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal directly contravenes the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, or cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. Additionally, there is a failure to establish a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been appropriately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and making a lawful conclusion regarding acceptable impacts unattainable.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, alongside conflicts with policy and unresolved environmental risks, obstructs the possibility of a lawful and evidence-based decision. The competent authority is urged to either refuse consent on these grounds or exercise the relevant regulatory powers to demand the missing information.

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

Additional Comments

Having been brought up on the island and visit regularly to enjoy the landscape and atmosphere, it is alarming to think such large structures should be allowed to be built

so close to the island.

It is obvious that it will negatively impact so many aspects of island life and be visually disturbing to residents and tourists. These structures also have a limited lifespan , are not environmentally friendly to build and will have enormous cost to build and replace. Many people will financially benefit from this project but it will not be the people of Scotland. This must not be allowed to take place and alternative means of energy production needs to be secured.

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: C8309CA2

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 and fails to deliver a complete, clear, or dependable account of the likely environmental impacts associated with the proposal. The incorporation of a flexible Project Design Envelope,

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposal is fundamentally flawed, revealing significant gaps in evidence and inconsistencies that undermine its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to sufficiently demonstrate that these species will not face adverse effects. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks of displacement, collision, or habitat loss.

A notable contradiction arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the evidence.

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

The positioning of turbines within a designated migratory corridor presents an additional and considerable risk, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term implications of sustained mortality within this corridor or its potential impact on species with relatively small global populations.

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

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

Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. Such shortcomings obstruct a thorough evaluation of impacts and lead to the conclusion that the application does not meet the statutory requirements essential for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application proposes the introduction of large-scale turbines along the West Lewis coastline, an area renowned for its open Atlantic horizon and undeveloped character. This would result in a continuous industrial presence that fundamentally alters the landscape, leading to a permanent and irreversible transformation. The assessment provided does not adequately capture the magnitude of the visual change that would occur. The scale and proximity of the turbines are such that they would dominate views

from nearby residential areas, historic sites, and frequently visited coastal locations, which would severely impact visual amenity and diminish the essential qualities of naturalness and remoteness.

Methodological concerns arise from the selection and presentation of visual viewpoints within the assessment. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, casting doubt on the assessment's reliability.

Moreover, the assessment fails to consider the interconnectedness of landscape, seascape, and cultural heritage. Notably, sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation neglects their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy perspective, the proposal directly conflicts with National Planning Framework 4 regarding the protection of natural places and historic assets. The proposed scale of change is incompatible with safeguarding landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any claims of compliance with policy.

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

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

TOURISM

The analysis of tourism impacts presented in the application is notably inadequate, failing to evaluate the economic and social ramifications for a pivotal sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. The application itself states that 86% of visitors are attracted by the scenery, yet it lacks a quantifiable assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers,

their behaviour, or the overall economic contributions they make.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, there is no modelling within the application regarding how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or instead harm an established and expanding sector.

The failure to address the significance of environmental quality in sustaining tourism is evident, especially regarding how unspoiled landscapes and dark skies enhance the visitor experience, as well as their importance to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortcoming, creating a critical void in understanding the impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the neglect of tourism impacts has broader consequences for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been thoroughly evaluated, 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 establish net benefit. It is at odds with strategic objectives that highlight tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to assess the economic repercussions of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency results in a significant evidential gap. This deficiency hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm reflects a significant failure to meet the criteria of sustainable development when evaluated against statutory duties, national policy, and evidential requirements. It mirrors the critical issues associated with the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new proposal is presented within a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Fundamental to the assessment process is the lack of a comprehensive and reliable evidential foundation. The application reveals notable deficiencies in baseline data and

continues to rely on an undefined design envelope. Moreover, it depends on mitigation measures that remain unspecified and fails to account for significant impact pathways, such as those related to nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, obstructing a thorough understanding of probable significant effects or residual impacts.

There are also evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment represents a violation of statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a significant omission. These deficiencies impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal conflicts directly with National Planning Framework 4. It fails to demonstrate adequate protection of biodiversity, natural spaces, and cultural heritage, does not substantiate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, thereby obscuring consequences for peatlands, carbon balance, habitats, and crofting land.

The environmental risks remain uncertain and could potentially be significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential standard necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extent of information deficiencies, coupled with conflicts with policy and unresolved environmental risks, precludes a lawful, evidence-based decision. The competent authority is urged either to deny consent on these grounds or to invoke the appropriate regulatory measures to obtain the missing information.

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

Additional Comments

I object on the grounds of visual impact, damage to the tourism industry and adverse effect on bird life

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: A57265ED

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting material deficiencies across planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the proposal directly challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis necessary for a lawful determination. There are significant gaps in critical environmental data, with baseline information proving to be limited and inconsistent. Furthermore, key components of the proposal are not clearly defined. The reliance on a flexible design framework undermines a clear understanding of likely significant effects, while the use of unspecified mitigation measures means their effectiveness cannot currently be evaluated. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts involved, with claims of negligible or non-significant effects lacking robust evidence.

Additionally, the proposal reveals clear and substantive conflicts with policy. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, particularly due to the large turbines being positioned in close proximity to the shoreline. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and unfit for a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is unreliable and incomplete. It lacks a full and transparent account of the potential environmental effects of the proposal. The approach of using a flexible Project Design Envelope creates significant uncertainty. Without specific details on turbine dimensions, layouts, or configurations, it is impossible to apply a consistent worst-case scenario. This undermines the integrity of the assessment, meaning that the impacts shown may not truly represent the final development. Consequently, both the public and the competent authority cannot grasp the full extent of the environmental effects.

The application depends on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the assumption that environmental harm will be addressed later inhibits any meaningful evaluation of these measures' effectiveness or an assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally unacceptable. It contradicts the aims of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies are established clearly before any determination.

Additionally, there are considerable gaps in baseline data, shortcomings in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of the impacts, especially where conclusions about negligible or non-significant effects are made without solid supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot meet statutory requirements.

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

In summary, the reliance on an undefined design envelope, the lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report insufficient and lacking in reliability. These deficiencies hinder a lawful and robust assessment of environmental effects and leave the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposal lacks a thorough assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured, evidence-based comparison of feasible alternatives that take into account environmental effects, the application only narrates the project's evolution. This approach does not convincingly show that less harmful options have been

identified, assessed, and selected over more damaging choices.

There is a clear absence of transparent analysis regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has adequately considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the lack of this analysis means it cannot be concluded that the proposed siting is the least damaging.

These shortcomings also apply to the assessment of cable routing and landfall, where there is insufficient evidence of thorough exploration of alternative routes to mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been effectively implemented, resulting instead in an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This situation reflects a failure to adhere to the established mitigation hierarchy, preventing the competent authority from discerning whether more suitable and less harmful alternatives are available. Without a robust alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, particularly regarding the safeguarding of natural areas, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant oversight, reinforcing the overall conclusion that the application has not undergone adequate evaluation and cannot facilitate a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability in its understanding of the ecological receptors within the West Lewis coastal environment, which is a biologically active and sensitive marine system. The baseline data provided is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to deliver a solid evidential basis for evaluating impacts.

One significant oversight involves otters, a species protected under European law. The application does not sufficiently acknowledge or assess their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an inadequate evaluation of the potential impacts stemming from construction disturbance, noise, and increased human activity. This flaw undermines any claims regarding the absence of significant effects on otters.

Deficiencies are also apparent in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic weather conditions. This method is likely to lead to an underestimation of their presence when compared to established land-based observations that reveal frequent use of these waters. The failure to incorporate or adequately consider such data contributes to an incomplete baseline, thereby diminishing the reliability of the conclusions reached.

These methodological shortcomings mean that conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4. The failure to properly identify and assess protected species contributes to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, represents a major shortcoming in the assessment. These sites serve as active places for burial and spiritual practice; however, they have been categorised merely as static features. This oversight fails to acknowledge their ongoing use and significance, as well as the potential impact of development on their setting. Such a mischaracterisation leads to an inadequate evaluation of cultural effects and neglects their importance within community life.

Furthermore, the assessment overlooks intangible aspects of cultural heritage, including the Gaelic language, local traditions, and the community's enduring relationship with the coastal environment. These elements are vital to the area's identity and have been wholly disregarded, marking a significant omission. The lack of consideration for these factors means the cultural impact of the proposed development cannot be fully comprehended.

There are also serious concerns regarding community rights and engagement. The Gaelic-speaking population, which possesses distinct characteristics of an Indigenous People, has not been granted the opportunity for Free, Prior and Informed Consent. The

absence of this meaningful engagement diminishes the credibility of the assessment and contradicts established principles of participation in decisions that affect cultural and environmental interests.

Additionally, a critical procedural gap exists due to the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination.

From a policy standpoint, these inadequacies place the proposal in direct conflict with National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to take into account both tangible and intangible heritage, and to recognise living cultural practices, represents a clear deviation from policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a considerable evidential gap. The cultural impacts of the development have not been adequately assessed, and the application does not present a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a significant concern. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been made available. This lack of access creates a substantial evidential gap, which hinders the public and the competent authority from fully grasping the range of social risks identified through the developer's own research.

Reports indicate that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These observations stem from direct engagement with the community and are not speculative in nature. The decision to withhold the full assessment restricts meaningful scrutiny of the findings and limits the ability to gauge their significance within the decision-making framework.

Furthermore, there are indications that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Nonetheless, these impacts have not been thoroughly incorporated into the main application nor given the appropriate weight they deserve. The absence of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This deficiency in transparency has implications for the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health

impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By failing to provide the complete dataset, the application lacks a solid evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not adequately demonstrate alignment with the National Planning Framework 4 concerning health and wellbeing. It is essential that development supports positive health outcomes and mitigates harm. However, existing evidence points to adverse effects that have not been fully disclosed. Without access to the complete assessment, it is impossible to establish compliance with this policy.

The procedural consequences are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This gap represents a significant omission in the application and signifies a failure to satisfy the evidential requirements dictated by the Environmental Impact Assessment regime.

In conclusion, the withholding of the complete Social Impact Assessment, coupled with evidence of current adverse impacts, results in an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information to support its case.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application involves the introduction of large-scale turbines close to the West Lewis coastline, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This development would create a dominant industrial presence that would fundamentally alter the existing landscape, resulting in a permanent and irreversible transformation.

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

Concerns also arise regarding the methodology used in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been underestimated, compromising the assessment's reliability.

Additionally, there is a notable deficiency in addressing the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider

landscape and are visually and spatially linked to the Atlantic horizon. However, the assessment treats these sites as isolated, failing to recognise their interdependence and leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This not only represents a visual impact but also signifies broader cultural and spatial harm, which has not been sufficiently addressed in the application.

From a policy standpoint, this proposal contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is incompatible with the need to safeguard landscape character, visual amenity, and the context of culturally significant sites. The absence of a thorough worst-case assessment further undermines any claim of compliance with policy.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents serious deficiencies in the assessment of construction and pollution risks, which are crucial for understanding potential environmental impacts. It entails significant seabed preparation and installation activities within the dynamic Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, thereby obstructing a thorough evaluation of their effectiveness and sufficiency.

This dependence on future, undefined measures is particularly alarming due to the sensitivity of the local environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to disturbance and contamination from sediment. While the application acknowledges the risks associated with sediment mobilisation and possible chemical or oil spills, it fails to provide adequate information on preventative, controlling, or monitoring strategies.

There is significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of rigorous modelling and clearly articulated management strategies, it is impossible to

ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on sensitive marine species and habitats identified in the broader assessment.

Furthermore, the lack of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent is granted, the application inhibits an evaluation of whether sufficient safeguards exist to manage pollution incidents. This presents procedural risks and compromises the capacity of the competent authority to properly assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the principles set forth in the Environmental Impact Assessment regime. Significant effects and required mitigation must be thoroughly assessed prior to consent; the absence of such information renders a lawful determination unattainable. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Collectively, the lack of defined mitigation measures, insufficient management plans, and uncertainties about potential impacts render the assessment fundamentally inadequate. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant concerns regarding its assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be safeguarded from disruption.

A notable issue is the presumption that fishing activities can be relocated without adverse effects. The application lacks any evidence that alternative fishing grounds are available or can support the additional pressure caused by displacement. This significant gap raises the potential for overfishing in other areas, with possible wider economic repercussions for the local fishing fleet. Without a comprehensive and evidence-backed assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, especially due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is expected to disturb a wide area, impacting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

The application also exhibits a contradictory stance regarding the need for licences for

harm to European Protected Species, while simultaneously characterising the impacts as negligible. This inconsistency undermines the credibility of the assessment and raises questions about adherence to the Habitats Regulations, particularly when harm is anticipated to a degree that necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed onshore infrastructure is fundamentally flawed, failing to capture the full scope of the impacts associated with what constitutes a single integrated project. The linkage between the offshore turbines and the onshore works is crucial; however, they are evaluated in isolation. This fragmented approach obscures the true environmental and socio-economic consequences of the project.

Onshore elements entail significant interventions, including cabling through protected moorland, the construction of a substation close to Stornoway, and necessary access infrastructure across sensitive landscapes. Such construction involves excavation in areas of deep peat, notably within Barvas Moor, a vital carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts precludes a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts or deferring this evaluation, the application inhibits an accurate appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all project components be examined collectively. However, by treating offshore and onshore elements separately, the combined impacts on habitats, peatlands, and local communities remain inadequately understood.

There are considerable risks posed to sensitive habitats such as machair systems and peatland environments, which are protected under existing policies. The application fails to adequately demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, leaving a

significant evidential gap concerning biodiversity protection.

Furthermore, the proposal raises critical issues regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that undermines the aims of renewable energy initiatives. The application does not sufficiently address this matter or show that the overall carbon balance is still beneficial.

Additionally, the routing of infrastructure through active croft land poses potential conflicts with established land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, which raises concerns about the feasibility and lawful execution of the project.

From a policy standpoint, the failure to assess the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests is 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 summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal includes the installation of permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect visible across long distances along the western horizon. This lighting would fundamentally alter the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies, an essential aspect of the area's environmental quality, cultural identity, and tourism potential. The absence of an assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors is troubling, especially considering the significance of dark skies for the region's identity and the growing field of astro-tourism.

Moreover, the application fails to evaluate the effects of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototaxis, which can result in disorientation and heightened collision risks. There is no lighting impact assessment or phototaxis study included in the application, leaving a critical gap in understanding how aviation lighting may impact these species and potentially increase mortality rates.

This oversight is further exacerbated by the dependence on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. Species like Kittiwakes, which forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk remains unassessed. The lack

of site-specific night-time data contributes to a significant deficiency in understanding the ecological impacts of the proposal.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning the safeguarding of natural environments and environmental quality. It also diminishes the overall evaluation of landscape and seascape impacts, given that night-time character is a vital component of the environment.

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

TOURISM

The Isle of Lewis has seen significant growth in its tourism sector, with the economic contribution increasing from £65 million in 2017 to over £81.5 million, providing support for more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application under consideration lacks a thorough assessment of tourism impacts, failing to evaluate both the economic and social consequences for this crucial sector. While it is acknowledged that 86% of visitors are attracted by the area's scenery, there is no quantified analysis regarding how large-scale offshore infrastructure might affect visitor numbers, behaviour, or the overall economic contribution of tourism.

The assessment neglects the essential role of environmental quality in sustaining tourism, particularly regarding unspoiled landscapes and dark skies, which significantly enhance the visitor experience. The omission of a Dark Skies Assessment exacerbates the shortcomings of the evaluation, leaving a substantial gap in understanding the implications for an increasingly important segment of the local economy, such as nature-based tourism and astro-tourism.

In a community that relies heavily on a limited economic base, the failure to evaluate the impacts on tourism has broader repercussions for employment, local businesses, and the sustainability of the community. Furthermore, there is an absence of a compliant Island Communities Impact Assessment, which means the economic vulnerabilities under the Islands (Scotland) Act 2018 have not been properly assessed.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4, especially regarding economic impact and the necessity to show net benefit. It also contradicts strategic objectives that prioritise

tourism as a growth sector and lacks the evidence required for the competent authority to evaluate the economic ramifications of the proposal.

Overall, the combination of failing to quantify tourism impacts, neglecting to assess the environmental drivers of visitor behaviour, and disregarding the island's economic dependency leads to a significant evidential gap. This situation hampers a comprehensive evaluation of the economic effects and suggests that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development when evaluated against national policy, statutory obligations, and evidential requirements. Notably, this application brings forth the same principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, which highlighted an unacceptable level of industrialisation. Although presented under an enhanced policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application remains fundamentally flawed.

A significant concern is the lack of a complete and reliable evidential basis for determination. Critical gaps exist in baseline data, and there is continued reliance on an undefined design envelope alongside unspecified mitigation measures. Key impact pathways are omitted, including those related to nocturnal wildlife, the full extent of onshore infrastructure, and effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

Procedurally, there are marked deficiencies. 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 the complete Social Impact Assessment constitutes a material omission, impeding the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. Such oversights render the application unfit for determination.

Furthermore, the proposal directly contradicts the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Additionally, it fails to show that health and wellbeing impacts are acceptable and lacks the necessary 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 obscured impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific

doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, alongside conflicts with policy and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to compel the submission of the necessary information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

I lived on the Isle of Lewis for a number of years. I know the island well and I have major concerns that this will only negatively impact the island and the people there.

I have worked for SSN Transmissions and understand that energy generated is passed back to the grid but the energy consumed has a higher tariff because of “distance required to transmit the energy”. It’s a disgraceful way for islanders to be treated and given the unspoiled nature of the environment, any changes should be beneficial to local people and to Scotland. Not to foreign investors.

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: D86EF5D2

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and its supporting documentation has revealed numerous material deficiencies across planning, environmental, cultural, and procedural domains. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, nearly untouched environment, and robust cultural identity. The scale, proximity, and design of the wind farm raise significant concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The employment of a flexible design framework hinders a clear understanding of likely significant effects. Additionally, the reliance on yet-to-be-defined mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

There are notable and significant policy inconsistencies. The proposal appears to conflict 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 obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies present in the Environmental Impact Assessment Report raise significant concerns regarding its reliability and transparency in portraying the potential environmental impacts of the proposal. The application employs a flexible Project Design Envelope that lacks commitment to particular turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. Consequently, the environmental impacts outlined may not accurately represent the final development, which inhibits both public understanding and that of the competent authority regarding the actual extent of environmental effects.

Furthermore, the application leans heavily on mitigation measures, management plans, and monitoring strategies that remain undefined at this stage. As such, the request for consent is predicated on the assumption that environmental harms will be addressed subsequently, preventing any substantive evaluation of their effectiveness or the assessment of residual impacts. This deferral of critical information until after consent is granted is procedurally improper and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly defined before any determination is made.

The report is also marred by significant evidential shortcomings, notably the presence of gaps in baseline data and limitations in the methodology employed, alongside an over-reliance on assumptions rather than site-specific evidence. Such shortcomings result in uncertainty concerning the scale and significance of impacts, particularly where findings indicate negligible or non-significant effects without the requisite supporting data. The lack of comprehensive information impedes a clear understanding of cumulative and worst-case impacts, engendering scientific uncertainty that cannot meet the statutory requirements.

As a result, the application does not satisfy the evidential criteria stipulated under the Habitats Regulations necessary to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is unable to establish that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and evidence-based assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment

regime. Instead of offering a detailed comparison of realistic alternatives based on their environmental impacts, the submission merely recounts the project's development history. This narrative approach does not convincingly show that less harmful options have been identified, evaluated, and chosen over more damaging alternatives.

There is a notable absence of transparent comparisons regarding alternative offshore sites, development scales, or design configurations. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact, the lack of such analysis raises significant concerns about whether the proposed location is indeed the least damaging option available.

This inadequacy extends to the evaluation of cable routing and landfall options, where there is insufficient evidence that alternative paths have been adequately considered to prevent or lessen impacts on sensitive areas. These include culturally and spiritually significant sites such as Barvas Cemetery. The failure to implement a clear avoidance strategy, along with the absence of comparative analysis, suggests that mitigation through design has not been effectively employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not satisfactorily demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a significant deviation from the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether more appropriate and less harmful alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal aligns with sustainable practices or complies with relevant policies.

From a policy standpoint, this shortfall undermines adherence to the National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a systematic and comparative assessment is a critical deficiency that leads to the conclusion that the application has not been sufficiently evaluated and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The 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 of the proposed development is fundamentally flawed, raising serious concerns about its reliability. It presents significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing decline. Yet, the application fails to demonstrate to the necessary evidential standard that these species will not face adverse effects. Key foraging areas and migratory pathways, which are critical to these birds, are not adequately evaluated in terms of displacement, collision risk, or habitat loss.

A critical contradiction arises in the application itself, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only applicable if significant harm is anticipated.

This inconsistency raises serious questions about the assessment's validity and suggests that the conclusions drawn are unsupported by the actual evidence presented. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is not properly acknowledged, and the reliance on modelling introduces further uncertainty, especially concerning species that are already in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain inadequately understood.

Additionally, the positioning of turbines within a recognised migratory corridor presents another substantial risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and potential effects on species with relatively small global populations are not sufficiently assessed by the application.

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 contradictory conclusions, alongside data gaps and limitations in modelling, prevents the standard of beyond reasonable scientific doubt from being achieved. This invokes the precautionary principle, which should inhibit a lawful conclusion in favour of consent.

The identified deficiencies also signify non-compliance with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The lack of evidence to confirm that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

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

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 living cultural landscape intimately connected with environment, language, tradition, and community. The application reduces heritage to isolated, static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the inadequate treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment regards them merely as static features. This oversight ignores their continued significance and the impact of development on their surroundings, leading to an incomplete evaluation of cultural

effects and a disregard for their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the deep-rooted relationship between the community and the coastal environment. These aspects are vital to the area's identity but are not addressed, indicating a substantial omission. Without considering these elements, the cultural impact of the development remains poorly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity, recognised as characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the validity of the assessment and fails to adhere to established principles of participation concerning cultural and environmental interests.

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

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

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations create a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application lacks a solid foundation for evaluating 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, but the full report remains unpublished. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks identified by the developer's own research. Summaries suggest that residents are facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement, making them concrete rather than speculative. Nevertheless, the failure to disclose the entire assessment limits scrutiny of the findings and affects their significance in the decision-making process.

Furthermore, the proposal is perceived as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Unfortunately, these impacts have not been adequately integrated into the main application or given the appropriate weight they deserve. The withholding of the complete Social Impact

Assessment obscures the actual human and social costs of the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By failing to provide the full dataset, the application does not offer a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and avoid causing harm, yet the available evidence indicates that there are existing adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy cannot be assured.

The procedural ramifications are substantial. The competent authority cannot conduct a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This omission constitutes a material shortcoming within the application and a failure 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 existing adverse impacts, leads to an incomplete and unreliable assessment. This situation hampers a lawful determination and strengthens the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development of large-scale turbines close to the West Lewis coastline threatens to fundamentally alter the character of this sensitive environment. This area is characterised by its open Atlantic horizon, undeveloped landscape, and strong sense of remoteness. The introduction of such industrial structures would create a continuous and dominant presence along the shoreline, leading to a permanent and irreversible transformation of the landscape.

The assessment provided does not sufficiently reflect the magnitude of the visual changes anticipated. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations, significantly impacting visual amenity and diminishing the qualities of naturalness and remoteness that define the region. The assessment fails to convey the true level of impact and its significance, given the sensitivity of the landscape involved.

Moreover, there are notable methodological shortcomings in the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the potential visual impact has been underestimated, which

undermines the reliability of the overall assessment.

Another critical gap is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their surroundings, with visual and spatial relationships tied to the Atlantic horizon. Treating these sites as isolated entities fails to acknowledge their interdependence, leading to an incomplete assessment of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This signifies not just a visual impact, but also a broader cultural and spatial detriment that has not been sufficiently examined within the application.

From a policy standpoint, this proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The anticipated scale of change contradicts the requirement to preserve landscape character, visual amenity, and the settings of culturally significant sites. The failure to conduct a thorough worst-case assessment further undermines any claims of compliance with policy.

The detrimental impacts identified cannot be adequately mitigated. The scale, height, and proximity of the turbines ensure their presence would be both dominant and unavoidable. Consequently, the change is fundamental and permanent, resistant to reduction through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposed works involve significant seabed preparation and installation activities in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate potential environmental effects adequately. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be developed after consent is granted, which hampers any meaningful assessment of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. While the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not provide sufficient detail on the methods for prevention, control, or monitoring of such incidents.

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

The lack of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a post-consent phase, the application fails to allow for a proper evaluation of whether adequate safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are evaluated prior to consent, and in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

Overall, the combination of undefined mitigation measures, insufficiently detailed management plans, and uncertainty regarding potential impacts renders the assessment materially deficient. These shortcomings obstruct a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

Moreover, the potential risks to marine species, especially due to construction-related underwater noise, are of great concern. The expected high-energy hammer piling over a prolonged period poses disturbances that could affect marine life, including the local bottlenose dolphin population. Despite the predicted significant disruption, the

application downplays these potential effects and fails to provide adequate supporting evidence for its claims.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is not only incomplete but fails to capture the full extent of impacts from what constitutes a single integrated project. The offshore turbines are connected to the onshore works, yet these elements are 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 related access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment in the application means that the overall environmental footprint of the project is not fully understood.

By excluding or deferring the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project must be considered collectively. However, the separation of offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local

communities.

There are notable risks to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been put in place. This gap raises significant concerns regarding biodiversity protection.

The proposal also brings forth issues related to carbon balance. Disturbing peatland can release stored carbon, potentially leading to a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this concern or show that the overall carbon balance is beneficial.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is insufficient evidence in the application indicating that necessary consents or processes have been initiated, casting doubt on the project's deliverability and lawful implementation.

From a policy standpoint, the failure to assess the project as 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 undermines the application further.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is missing a crucial evaluation of dark skies and nocturnal wildlife, representing a serious oversight. The West Lewis coastline is distinguished by its exceptionally dark skies, which are vital for environmental quality, cultural identity, and tourism. The proposed introduction of permanent red aviation lighting would create a pervasive "wall of light" effect that could transform the night-time environment significantly.

The lack of analysis regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors is particularly alarming, especially considering the significance of dark skies to the area's identity and the growth of sectors such as astro-tourism. This gap in the environmental assessment is critical as it fails to address how such lighting may disrupt the landscape and overall environment.

Moreover, the application neglects to assess the potential impacts on nocturnal wildlife. Species that include Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, as it can lead to

disorientation and increased risk of collision. Without any lighting impact assessment or studies on phototaxis, the application does not evaluate how aviation lighting might affect these species or contribute to increased mortality rates.

This critical omission is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and associated threats. Kittiwakes, for example, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this concern has not been addressed. The absence of night-time specific data presents a significant gap in understanding the ecological impacts of the proposal.

In the absence of an assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard to demonstrate that no adverse effects exist beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and hinders a lawful determination.

From a policy standpoint, the omission contravenes the National Planning Framework 4 concerning the protection of natural environments and the quality of the ecosystem. This disregard also weakens the comprehensive assessment of landscape and seascape impacts, given that the character of night-time is an essential component of the environment.

Overall, the lack of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The absence of baseline data, impact modelling, and species-specific analyses makes the application incomplete and insufficient to support a lawful determination.

TOURISM

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social consequences for a vital part of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and a sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a detailed evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has seen 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 fails to consider how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. Without this analysis, it is impossible to determine if the proposed development would yield a net economic benefit or detrimentally impact an established and expanding sector.

Moreover, the assessment does not address the critical role of environmental quality in

sustaining tourism, overlooking the significance of unspoiled landscapes and dark skies for visitor experiences and 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 implications for a recognised and burgeoning segment of the local economy.

In a community with limited economic diversity, neglecting the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a thorough Island Communities Impact Assessment means these economic vulnerabilities have not been examined as required under the Islands (Scotland) Act 2018.

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

Overall, the failure to quantify tourism impacts, assess environmental influences on visitor behaviour, and consider the island's economic dependencies results in a significant evidential void. This inhibits a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application echoes the central issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. The current proposal is presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis necessary for proper determination of the application. It lacks complete baseline data and relies on an undefined design envelope. Moreover, it depends on unspecified mitigation measures and omits crucial impact pathways, such as those affecting nocturnal wildlife, full 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.

Procedural failures are evident in this proposal. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018, and failing to present a complete Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from accurately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

In addition, the proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. There is insufficient evidence of acceptable health and wellbeing impacts, and the absence of tourism impact modelling fails to establish a net economic benefit. The cumulative impacts of offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain regarding environmental risks. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This invokes the precautionary principle, which prevents a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would lead to significant and irreversible alterations to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, disrupt dark skies, and affect cultural and visual relationships, along with tourism impacts. These represent permanent effects that cannot be adequately mitigated.

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

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

Additional Comments

I visit the west coast of Lewis annually but will no longer be doing so if there is a giant wind farm in sight. I would visit a different island instead.

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: 1D4882E4

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted in accordance with the marine licensing and Environmental Impact Assessment regulations. It arises from an evaluation of the Environmental Impact Assessment Report and the associated documentation, highlighting significant deficiencies across planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong sense of cultural identity. Concerns about the scale, proximity, and design of the project question its alignment with statutory requirements, national policies, and the tenets of sustainable development.

The application lacks an adequate evidential basis necessary for lawful determination. There are notable gaps in critical environmental data, with baseline information appearing limited and inconsistent, while key elements of the proposal remain unspecified. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures hinders any assessment of their effectiveness. Consequently, the available documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, rendering unsupported the claims of negligible or non-significant effects.

Additionally, there are substantial conflicts with established 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 that national obligations to protect biodiversity, climate interests, and environmental integrity will be fulfilled. These discrepancies challenge the statutory tests for consent and impede the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal, featuring large turbines situated near the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and not capable of supporting a lawful determination. In light of these factors, it is imperative that the precautionary principle be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a complete and transparent account of the anticipated environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This variability undermines the integrity of the assessment and means that the impacts outlined may not accurately reflect the final development. Consequently, both the public and the competent authority are left without a clear understanding of the actual environmental effects.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later impedes any substantial evaluation of effectiveness or assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation measures be clearly established before a decision is made.

Significant evidential gaps persist, including deficiencies in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate uncertainty about the magnitude and significance of impacts, especially where conclusions regarding negligible or non-significant effects lack robust supporting data. The failure to provide adequate information hinders a proper understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory obligations.

As a result, the application does not fulfil the evidential requirements set by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, especially in relation to biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

Overall, the reliance on an undefined design envelope, the lack of specified mitigation, and the inadequacies in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings preclude 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 application fails to provide a structured and evidence-based assessment of alternatives, which is crucial under the Environmental Impact Assessment regime. Rather than presenting a reasoned comparison of viable alternatives based on their environmental impacts, it offers a narrative focused on the project's development. This

narrative does not sufficiently show that the developer has adequately identified and evaluated less harmful options in favour of those that are more damaging.

There is a lack of transparent analysis concerning alternative offshore locations, various scales of development, and potential design configurations. Notably, the application does not indicate that the developer has genuinely considered placing the turbines further offshore, an action that could mitigate visual, ecological, and coastal effects. Considering the sensitivity of the West Lewis coastline, the failure to address the importance of distance from shore in assessing impacts prevents a determination that the proposed site is the least damaging option available.

Moreover, the shortcomings extend to the routing of cables and the assessment of landfall sites, where there is inadequate evidence that alternative routes have been thoroughly examined to lessen impacts on sensitive receptors, including areas of cultural significance such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest a failure to apply mitigation by design, relying instead on post-design measures that may not be effective.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout planning, and infrastructure routing. This indicates a disregard for the established mitigation hierarchy, leaving the competent authority unable to ascertain whether there are more appropriate and less harmful alternatives. Without a comprehensive assessment of alternatives, it is impossible to assert that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment represents a significant omission, contributing to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to provide a thorough understanding of the ecological receptors in the West Lewis coastal environment. This marine system is both sensitive and biologically active, yet the baseline data is insufficient, and the methodologies applied do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a solid evidential foundation for evaluating impacts.

A critical oversight is the treatment of otters, a European Protected Species, where the application inadequately recognises and assesses their use of coastal areas for foraging and movement. The failure to account for their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. This significantly

undermines the conclusions regarding the absence of notable effects on this species.

There are further shortcomings in the assessment of basking sharks, as the reliance on aerial surveys introduces significant detection bias, particularly in Atlantic conditions. This approach is likely to underestimate their presence, especially in light of established land-based observations that indicate frequent usage of these waters. By not incorporating or properly considering such data, the assessment presents an incomplete baseline and diminishes the reliability of its conclusions.

These methodological deficiencies lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust 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 uncertainty raises concerns regarding the true extent of risks faced by marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these factors, consent cannot be legally granted.

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 and underscore the conclusion that the application is lacking a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. The ornithological assessment associated with the application is fundamentally flawed and exhibits considerable gaps in evidence and internal inconsistencies that detract from its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is situated within key foraging areas and migratory pathways. There is a failure to robustly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises in the application, where the developer claims that there are no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises doubts regarding the assessment's reliability and indicates that the conclusions presented lack adequate support from the underlying evidence.

Moreover, the assessment does not sufficiently prove 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 considered, and the reliance on modelling approaches contributes to uncertainty, especially for species like Kittiwakes and Fulmars that are in sharp decline. The methodologies employed are likely to underestimate mortality, particularly in situations where baseline data is incomplete and the behavioural responses of species are not fully understood.

The siting of turbines within a recognised migratory corridor adds another significant risk, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

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

Overall, 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 impacted puts the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence, ultimately contributing to the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vital cultural landscape where community, environment, language, and tradition are deeply intertwined. The assessment of cultural heritage and community identity falls short, treating heritage as isolated and static assets, rather than recognising their ongoing cultural, social, and spiritual significance to the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their continued importance and the impact of development on their surroundings, leading to an incomplete evaluation of the cultural effects and their significance to community life.

Furthermore, the assessment overlooks intangible cultural heritage elements, such as the Gaelic language and local traditions, as well as the community's longstanding relationship with the coastal environment. These factors are essential to the area's

identity but are entirely missing from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity and characteristics akin to those of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the assessment's legitimacy and disregards established participation principles regarding decisions that affect cultural and environmental interests.

A significant procedural shortfall is the lack of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to assess both tangible and intangible heritage, along with the lack of recognition of living cultural practices, signifies a departure from policy requirements.

Collectively, the neglect of living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a solid basis for understanding the true cultural costs associated with 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 has not been published. This lack of transparency creates a significant evidential gap, limiting both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by direct engagement and not mere speculation. However, the failure to disclose the complete assessment prevents adequate scrutiny of these findings, ultimately hindering the determination of their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal poses a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, these concerns have not been fully integrated into the main application or given the appropriate consideration they warrant. The withholding of the full Social Impact Assessment obscures the true human and social costs associated

with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be affected. The absence of the complete dataset means that the application does not present a full evidential basis for weighing the benefits against the harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and avoid negative consequences. However, the available evidence suggests that existing adverse effects have not been fully disclosed, making it impossible to demonstrate compliance without the full assessment.

The procedural implications of this situation are substantial. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a significant omission within the application and a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

Collectively, the non-disclosure of the full Social Impact Assessment, along with the evidence of existing adverse impacts, renders the evaluation incomplete and unreliable. This undermines lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly flawed and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and an undeveloped character, contributing to a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately convey the magnitude of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the naturalness and remoteness that define the area. The assessment does not accurately reflect this level of impact or its significance within such a sensitive landscape.

There are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the

visual impact may be understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of evaluation regarding the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships with the Atlantic horizon. The assessment treats these as isolated features, failing to acknowledge their interdependence, which leads to an incomplete evaluation of impacts on their setting and cultural significance.

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

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

It is also evident that the impacts outlined 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, unable to be reduced to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works in a high-energy Atlantic environment, but the assessment of construction and pollution risks remains incomplete. It lacks the necessary detail to effectively evaluate the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application leans on mitigation and contingency measures that are to be formulated post-consent, which obstructs any thorough assessment of their sufficiency or potential effectiveness.

This reliance on unspecified future measures is particularly alarming given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges certain risks, including

sediment mobilisation and accidental chemical or oil spills, it fails to offer adequate information on the strategies for their prevention, control, or monitoring.

Moreover, there exists considerable uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to the possible effects on marine species and habitats 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 obstructs the evaluation of whether appropriate measures are established to tackle pollution events. This introduces procedural risk and compromises the ability of the competent authority to appraise environmental protection measures effectively during the determination process.

From a regulatory standpoint, this deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to granting consent, and when such critical information is absent, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of fisheries and marine life, failing to provide a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet there is no evidence in the application demonstrating that these habitats and activities can be protected or maintained without significant disruption.

A major concern lies in the assumption that fishing activities can be displaced without repercussions. The application does not offer proof that alternative fishing grounds exist, are accessible, or can handle additional pressure. This significant omission raises the risk of overfishing in other areas and poses potential economic challenges for the local fleet. The inability to deliver a clear and evidence-based assessment means that the effects on fisheries and livelihoods remain unclear.

Moreover, substantial risks to marine species are introduced, particularly due to the underwater noise associated with construction activities. The use of high-energy

hammer piling over an extended timeframe is expected to cause disturbances across considerable distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate supporting evidence.

There is a notable inconsistency in the application that acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing impacts as negligible. This contradiction undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

By omitting or delaying the assessment of onshore impacts, the application hinders the accurate evaluation of cumulative effects. The Environmental Impact Assessment

process stipulates that all project components be evaluated collectively. However, the division of offshore and onshore elements prevents a full comprehension of the combined impacts on peatlands, habitats, and local communities.

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

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

A critical omission within the Environmental Impact Assessment is the failure to evaluate the effects of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This gap is significant due to the rising importance of dark skies for the area's cultural identity and for emerging tourism sectors like astro-tourism. Furthermore, the absence of any lighting impact assessment or phototaxis study fails to address how this aviation lighting might affect nocturnal wildlife,

particularly sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are prone to disorientation and increased collision risk due to artificial lighting.

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

Without a proper assessment of nocturnal impacts, it cannot be determined whether protected species or designated sites would face adverse effects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt remains unfulfilled, invoking the precautionary principle and rendering a lawful determination impossible.

From a policy standpoint, these omissions contradict National Planning Framework 4 concerning the protection of natural places and environmental quality. They also compromise the broader assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

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

TOURISM

The assessment of tourism impacts presents significant deficiencies and does not adequately consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Given the reliance of tourism on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness, this oversight is particularly concerning. The application states that 86% of visitors are attracted by scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or overall economic contributions.

Tourism has seen notable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the proposal does not model the potential effects of industrialising the seascape and diminishing environmental quality on Tourism Gross Value Added or broader economic resilience. Without such an analysis, it is impossible to ascertain whether the development would yield a net economic benefit or jeopardise this established and expanding sector.

Moreover, the assessment neglects the significance of environmental quality for tourism, especially the value of unspoiled landscapes and dark skies to visitor

experiences, including growing markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this gap, leaving a considerable lack of understanding regarding impacts on an acknowledged and burgeoning segment of the local economy.

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

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4, particularly concerning economic impact and the requirement to show a net benefit. Furthermore, it conflicts with strategic objectives that recognise tourism as a priority growth sector and fails to supply sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

Collectively, the shortcomings in quantifying tourism impacts, assessing the environmental factors driving visitor behaviour, and recognising the island's economic dependency culminate in a significant evidential gap. This ultimately hinders a robust assessment of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm 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.

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: 574EFE4E

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 requirements. The basis of this objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The size, location, and design of the wind farm present serious issues regarding their compliance with statutory obligations, national policies, and the overarching principles of sustainable development.

The application is fundamentally flawed due to its failure to present sufficient evidence for a lawful decision. Notably, essential environmental data is absent, baseline information provided is limited and inconsistent, and crucial elements of the proposal lack clear definition. The flexible design framework used raises doubts about the understanding of significant impacts, while the reliance on unspecified mitigation strategies hampers any assessment of their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts lack credible substantiation.

Additionally, the application reveals substantial conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. There is no evidence to demonstrate that national obligations regarding the protection of biodiversity, climate considerations, and environmental integrity can be fulfilled. These inconsistencies directly affect the statutory tests necessary for consent, thereby compromising the capability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposed development raises further concerns, with large turbines positioned unnervingly close to the shore, leading to significant worries about landscape capacity, visual impact, and environmental consequences. In light of the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and does not support a lawful decision. Under these circumstances, it is imperative that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, this assessment does not deliver a sound evidential basis for assessing potential impacts.

A notable shortcoming is the assessment of otters, a European Protected Species. The application fails to properly acknowledge and evaluate their active use of coastal zones for foraging and movement. The oversight of their core foraging range and behavioural patterns results in a failure to adequately assess the potential effects of construction disturbances, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on the species.

Further concerns are raised regarding the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence. This is especially evident when compared to established land-based observations indicating frequent use of these waters. The omission of such critical data results in an incomplete baseline and further weakens the reliability of the conclusions drawn.

The methodological flaws highlighted mean that assertions of negligible or non-significant effects rely on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impacts is seriously flawed, containing significant gaps in evidence and inconsistencies that cast doubt on its conclusions. The west

coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already declining. However, the application does not adequately prove that these species will not be harmed. The proposed development is situated within key foraging areas and migratory routes, yet the assessment fails to thoroughly consider the risks of displacement, collision, and habitat loss.

There is a fundamental contradiction in the application; the developer claims no significant adverse effects, yet also presents a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions drawn are not supported by the evidence available.

Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected areas, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is inadequately addressed, and the reliance on modelling approaches adds uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies used likely underestimate mortality rates, especially given that baseline data is insufficient and behavioural responses are not fully understood.

The placement of turbines within an established migratory corridor presents an additional and considerable risk, effectively serving as a barrier along a primary flight path used by species moving between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential impacts on species that have relatively small global populations.

Regulatory requirements are not met, as the application does not achieve the evidential standard necessary to conclude that there will be no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt is not fulfilled. This invokes the precautionary principle and makes it impossible to lawfully support consent.

These identified deficiencies also signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to show that internationally important seabird populations will not be adversely impacted places the proposal in direct opposition to national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and lead to the conclusion that the application does not satisfy the statutory requirements needed for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposal currently under consideration presents a number of significant shortcomings regarding the assessment of cultural heritage and community identity. It fails to recognise the West Lewis coastline as a dynamic cultural landscape, where environment, language, tradition, and community are deeply interconnected. Instead, the application adopts a simplistic view that treats heritage as a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual significance within the community.

Particularly troubling is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places of burial and spiritual practice; however, the assessment reduces them to static features, neglecting their continued use and meaning as well as the effects that development may have on their surroundings. This oversight leads to an incomplete evaluation of cultural impacts and disregards the vital role these sites play in community life.

Moreover, the application does not adequately consider intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These aspects are crucial to the identity of the area but have been overlooked entirely, representing a major omission. Without addressing these elements, the true cultural impact of the development cannot be accurately assessed.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity, recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent conducted. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to align with established principles of participation in decisions affecting cultural and environmental matters.

A notable procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. Without this necessary assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic ramifications on the island community, thereby rendering a lawful determination impossible.

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

In conclusion, the combined failures to assess living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the development have not been properly evaluated, and the application lacks a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding social impacts, health, and wellbeing, as the assessment currently lacks the necessary transparency for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of access creates an important evidential gap, inhibiting both public understanding and the competent authority's ability to assess the identified social risks based on the developer's own research.

Local residents have reported measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore concrete rather than speculative. However, the omission of the full assessment hampers proper scrutiny of the findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is viewed as a potential threat to community identity and cohesion, with the concept of “cultural loss” highlighted in the developer's findings. Despite this acknowledgment, the impacts related to community cohesion have not been adequately incorporated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency 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 they may affect community character and functioning. By failing to provide the complete dataset, the application does not offer a solid evidential foundation for weighing benefits against 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 developments to promote positive health outcomes and mitigate harm, yet the available evidence reveals existing adverse effects that have not been fully addressed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural implications of this situation are considerable. The competent authority cannot perform a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This omission constitutes a significant gap in the application and does not meet the evidential requirements established by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of ongoing adverse impacts, results in an incomplete and unreliable assessment. This scenario impedes a lawful determination and highlights the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment conducted regarding seascape, landscape, and visual impacts is lacking in material detail and does not adequately consider the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed installation of large-scale turbines in proximity to the shoreline would introduce an overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

There is a concerning inadequacy in how the application represents the scale of visual change. The size and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately express the significance of this impact within the context of such a vulnerable landscape.

Moreover, there are methodological issues regarding the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not comprehensively represent the most sensitive receptors or the worst-case scenarios, especially concerning vital cultural heritage sites and high-value landscapes. This raises the concern that the magnitude of visual impact has been understated, compromising the reliability of the assessment.

Another critical shortcoming 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 exist within a broader landscape context interlinked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The extent of change is incompatible with the imperative to protect landscape character, visual amenity, and the settings of culturally important sites. The lack of a thorough worst-case assessment further undermines any assertion of policy adherence.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resulting change is fundamental and permanent,

unable to be reduced to an acceptable level through mitigation.

In summary, the assessment fails to accurately capture the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable 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 lacks completeness and fails to provide the necessary detail to evaluate potential environmental effects. The proposal entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be formulated after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

This dependence on undefined future measures raises significant concerns due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disruption and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on prevention, control, or monitoring strategies.

Additionally, there is uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also relates to potential effects on sensitive marine species and habitats identified in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risks and diminishes the capability of the competent authority to assess environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is necessary to assess likely significant effects and mitigation measures before consent; without this information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts all contribute to

a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life provided within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. The waters adjacent to the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses can be safeguarded or maintained without significant disruption.

A notable concern is the assertion that fishing activities can be displaced without adverse consequences. The application does not present evidence that alternative fishing grounds are available, accessible, or capable of accommodating any additional pressure that might arise from this displacement. This oversight is critical, as such displacements pose the risk of overfishing in other areas and could have broader economic implications for the local fishing fleet. Without a detailed, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly due to underwater noise generated during construction activities. The use of high-energy hammer piling for extended periods is expected to disturb marine life across wide areas, with notable impacts on species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without providing sufficient supporting evidence.

Furthermore, there is a striking inconsistency within the application. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions regarding compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

The assessment also neglects to address cumulative impacts that result from various pressures such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for understanding the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to illustrate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusions about the proposal's

sustainability.

In conclusion, the deficiencies noted—including the lack of evidence regarding fishing displacement, an underestimation of acoustic impacts, and internal contradictions—render the assessment incomplete and unreliable. These shortcomings prevent a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is fundamentally inadequate, failing to acknowledge the comprehensive impacts arising from what constitutes a single integrated project. The connection between offshore turbines and onshore works is vital, yet they are evaluated in isolation, leading to a disjointed analysis that obscures the actual magnitude of environmental and socio-economic consequences.

The onshore components comprise cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, thus hindering a comprehensive understanding of the project's overall environmental footprint.

By excluding or postponing the evaluation of onshore impacts, the application obstructs a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be assessed collectively, but the division between offshore and onshore components results in an insufficient grasp of the combined repercussions on peatlands, habitats, and local communities.

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

Moreover, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide proof that the requisite consents or processes have been initiated, casting doubt on the deliverability and legality of the implementation.

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

Overall, the fragmentation of project components, the lack of a comprehensive assessment, and the absence of supporting evidence regarding environmental and land

use impacts render this section of the application incomplete and unreliable, thereby impeding a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

There is a complete absence of assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of evaluation is particularly concerning given the significance of dark skies to the area's identity and to the emerging tourism sector, particularly astro-tourism. The failure to consider these factors results in a clear gap within the overall landscape and environmental assessment.

Moreover, the application does not evaluate the potential 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 cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a study on phototaxis means that there is no consideration of how aviation lighting may affect these species or contribute to increased mortality rates.

This situation is worsened by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or related risks. Kittiwakes, for instance, may forage or migrate at night and are also vulnerable to disorientation from artificial lighting, yet the application has not assessed this risk. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

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

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

Overall, the absence of any assessment of dark skies and nocturnal wildlife represents a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unsuitable for 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 proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the necessary standards of sustainable development, which are outlined in statutory

duties, national policy, and evidential criteria. It echoes the core issues that led to 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, the application falls short in numerous critical areas.

There are significant deficiencies in the evidential foundation required for decision-making. The application lacks comprehensive baseline data and relies on an undefined design envelope, with unspecified mitigation measures. Key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, preventing a thorough understanding of the likely significant effects or residual impacts.

Moreover, procedural failings are evident in the submission. The absence of a compliant Island Communities Impact Assessment breaches the statutory requirements of the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a material omission, which hinders the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks presented in the application remain uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination that the impacts are acceptable.

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

In light of these collective issues, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, impede the possibility of a lawful and evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

The impact on the bird life and wildlife is a major concern. This is an area of outstanding beauty.

If the people in Scotland receive absolutely no financial compensation when living with these monster then they should not be built.

They ruin landscapes and lives of all living creatures.

The infrastructure and destruction around them is significant and land, people and wildlife never recover.

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: A4199AB0

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the marine licensing and Environmental Impact Assessment processes. The objection is grounded in a thorough evaluation of the Environmental Impact Assessment Report and accompanying documentation, which reveal significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely unspoiled environment, and strong cultural heritage. The dimensions, proximity, and overall design of the project raise essential concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful assessment. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The flexible design framework employed inhibits a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a complete or informed assessment of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Substantive conflicts with existing policy are evident. 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 environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

The scale of the project is without precedent in this region, with large turbines proposed in very close proximity to the shoreline. This raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental consequences. In summary, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy inconsistencies illustrate that the application is incomplete and fails 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 presents numerous deficiencies that undermine its reliability and completeness, preventing a lawful assessment of the environmental effects associated with the proposal. A significant issue arises from the use of a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and inhibits a consistent application of a worst-case scenario, ultimately failing to provide both the public and the competent authority with a clear understanding of the potential environmental effects that may arise from the development.

Additionally, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. By seeking consent on the premise that environmental harm will be addressed later, it obstructs any meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures must be clearly established prior to determination.

Moreover, the report suffers from significant evidential deficiencies. There are notable gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. Consequently, the absence of comprehensive information hampers the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to align with statutory requirements.

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

In summary, the deficiencies stemming from an undefined design envelope, lack of specified mitigation, and inadequacies in baseline data lead to an unreliable Environmental Impact Assessment Report. These shortcomings prevent a robust and lawful assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, failing to deliver a complete understanding of the ecological receptors involved. This coastal area is known to be biologically rich and sensitive, yet the existing baseline data is insufficient, and the methods employed do

not effectively capture essential information about species presence, behaviours, and habitat utilisation. Consequently, the assessment lacks a reliable evidential foundation for impact evaluation.

One significant shortcoming pertains to otters, classified as a European Protected Species. The application does not adequately address or evaluate the active utilisation of coastal regions by otters for foraging and movement. This oversight neglects their core foraging range and behavioural patterns, resulting in an inadequate assessment of the potential impacts related to construction disturbances, noise, and increased activity. Such a gap undermines any assertions regarding the lack of significant effects on otter populations.

Furthermore, there are serious shortcomings in the evaluation of basking sharks, particularly as it relies heavily on aerial surveys that are prone to considerable detection biases in Atlantic conditions. This methodology likely leads to an underestimation of the species' presence, especially when compared to established land-based observations that show regular usage of these waters. The failure to integrate or properly consider such crucial data contributes to an incomplete baseline, thereby diminishing the trustworthiness of the conclusions drawn.

These methodological flaws mean that any assertions of negligible or non-significant impacts are founded on assumptions rather than solid evidence. Additionally, the lack of comprehensive baseline data hampers a meaningful evaluation of cumulative and indirect effects, including those related to seasonal variations and broader ecosystem interactions. This introduces significant uncertainty regarding the actual risks to marine species and habitats.

From a regulatory viewpoint, the application does not satisfy the stipulations set forth by the Environmental Impact Assessment framework and National Planning Framework 4, as it fails to adequately identify or evaluate protected species. The uncertainty created by these inadequacies obstructs the possibility of ruling out adverse effects with reasonable scientific certainty, thus invoking the precautionary principle. In this context, granting consent would not be legally permissible.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions ultimately renders the assessment unreliable. These deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, affirming that the application does not present a solid evidential basis for approval.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk,

or habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

There exists a fundamental contradiction in the application. The developer asserts that no significant adverse effects will occur while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and the validity of its conclusions, which are not substantiated by the evidence presented.

Furthermore, the assessment does not sufficiently account for the importance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches creates uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain inadequately understood.

The placement of turbines within a recognised migratory corridor introduces a notable risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed in the application, nor are the potential effects on species with relatively small global populations considered.

In light of these deficiencies, the application stands in direct conflict 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 face adverse effects undermines compliance with national policy.

Collectively, these factors contribute to the conclusion that the assessment does not fulfil the statutory requirements necessary to support a determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment represents a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's own research. Summaries indicate that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore grounded in reality. However, without access to the complete assessment, proper scrutiny of these findings is impossible, limiting the capacity to determine their significance in the decision-making process.

Moreover, there is a clear perception that the proposal poses a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer's

findings. Despite the recognition of these impacts, they have not been adequately integrated into the main application or given appropriate weight, as the withholding of the full Social Impact Assessment obscures the true human and social cost of 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 nature, especially when community character and functioning are at stake. The application's failure to provide the complete dataset results in an incomplete evidential basis for assessing the balance between potential benefits and harm.

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

The procedural implications of this situation are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without 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 conclusion, the combination of non-disclosure of the full Social Impact Assessment and evidence of existing adverse impacts renders the assessment incomplete and unreliable. This ultimately prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts and the relationship between landscape, seascape, and cultural heritage is fundamentally flawed, leading to an inadequate representation of the true scale of change and the sensitivity of the receiving environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, both of which would be severely compromised by the introduction of large-scale turbines near the shoreline. This would create a pervasive industrial presence that fundamentally alters the existing character of the landscape, resulting in a permanent transformation.

The application fails to capture the significant visual changes that would occur. The size and proximity of the turbines would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such domination would have a direct negative effect on visual amenity and would erode the essential qualities of naturalness and remoteness. The assessment does not adequately communicate the severity of these impacts or their importance within the context of this sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This suggests the potential for the visual impact to be understated, calling into question the assessment's overall reliability.

Another significant oversight is the lack of consideration for the interconnected nature of the landscape and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these sites as isolated elements, failing to acknowledge their interdependence and resulting in a partial evaluation of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The extent of the proposed change is incompatible with the obligation to protect 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 policy.

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 dominant and inescapable. This results in changes that are both fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

Collectively, these shortcomings in the assessment fail to reflect the true scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These deficiencies hinder a dependable evaluation and underscore 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, but the assessment of construction and pollution risks is lacking in detail needed for a thorough evaluation of likely environmental effects. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application, which instead relies on the preparation of mitigation and contingency measures after consent. This reliance on undefined future actions raises serious concerns, particularly considering the sensitivity of the West Lewis coastline, which is home to clean coastal waters and vulnerable habitats at

risk of sediment disturbance and contamination.

The application does acknowledge certain risks, such as sediment mobilisation and the potential for accidental chemical or oil spills, yet it fails to provide adequate information on how these risks will be prevented, controlled, or monitored effectively. Additionally, there is uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty is compounded by potential effects on already identified sensitive marine species and habitats within the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures, which further exacerbates the concerns regarding environmental protection. By postponing contingency planning to a post-consent stage, the application limits the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and diminishes the competent authority's capacity to assess environmental measures before a decision is made.

From a regulatory standpoint, deferring essential environmental safeguards conflicts with the requirements established by the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent; if this information is not available, a lawful determination cannot be achieved. The application also does not demonstrate compliance with relevant policy requirements concerning 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 robust evaluation of construction and pollution risks, further substantiating the conclusion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The application proposes a development that significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these vital uses and habitats can be protected or maintained in the face of potential disruptions.

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. As a result, without an evidence-based assessment, the implications

for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended timeframe is likely to disturb species over large distances, notably impacting the local bottlenose dolphin population. Concerns regarding the predicted disturbance to a significant proportion of these dolphins are serious, yet the application appears to downplay these effects without providing adequate supporting evidence.

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

The assessment is lacking in its consideration of cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These issues ultimately hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly inadequate and does not take into account the complete range of impacts resulting from this integrated development. The offshore turbines and onshore works are closely interrelated, yet they are evaluated separately, leading to a fragmented approach that obscures the true extent of environmental and socio-economic consequences.

Key onshore components include the installation of cabling across protected moorland and the construction of a substation in proximity to Stornoway, as well as the necessary access infrastructure through delicate landscapes. These activities entail excavation across deep peat areas, particularly in Barvas Moor, which serves as a crucial carbon store and is an ecologically sensitive habitat. Without a thorough assessment of these impacts, there is no comprehensive understanding of the project's overall

environmental footprint.

The decision to exclude or postpone the assessment of onshore impacts hampers the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process necessitates that all elements of a project be considered in conjunction; however, the distinct assessment of offshore and onshore components results in a lack of clarity regarding the combined effects on peatlands, habitats, and local communities.

There are also considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The current application fails to show that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been taken, indicating a significant evidential gap in relation to biodiversity protection.

Concerns about carbon balance are also pertinent. Disturbing peatland has the potential to release stored carbon, which could lead to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter nor does it prove that the overall carbon balance is beneficial.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. There is no evidence provided in the application that the requisite consents or processes have been initiated, which brings into question the project's feasibility and lawful implementation.

From a policy standpoint, the failure to assess the project holistically and to demonstrate adequate 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 mitigated or avoided undermines the application's credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

This application does not address the impacts of the proposed lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the

importance of dark skies to the area's identity and the emerging sector of astro-tourism, this lack of assessment is particularly concerning. Furthermore, there is no evaluation of how this lighting may affect nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The absence of a lighting impact assessment or phototaxis study fails to address these crucial effects.

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

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

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

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

TOURISM

The assessment of tourism impacts is significantly lacking, failing to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism is heavily reliant on the area's wild coastline, nearly untouched landscapes, dark skies, and the overall sense of remoteness. While the application acknowledges 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 could influence visitor numbers, behaviours, or the economic contributions overall.

Tourism has seen notable growth, escalating from £65 million in 2017 to over £81.5 million, which has supported more than 1,000 jobs and accounted for as much as 16% of the island's economy. However, the application neglects to model how the industrialisation of the seascape and the degradation of environmental quality might impact the Tourism Gross Value Added and broader economic resilience. The absence of such analysis prevents an informed determination on whether the development

would yield a net economic benefit or harm an established and expanding sector.

Moreover, the assessment does not take into account the crucial role of environmental quality in bolstering tourism, particularly regarding the significance of unspoiled landscapes and dark skies to visitor experience, as well as the potential of emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this inadequacy, leaving a notable void in understanding the impacts on an acknowledged and burgeoning segment of the local economy.

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

From a policy standpoint, the application fails to illustrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to demonstrate net benefit. It also contradicts strategic objectives that recognise tourism as a priority growth sector, and fails to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and consider the economic dependencies of the island culminates in a significant evidential gap. This inadequacy obstructs a thorough evaluation of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

Procedural shortcomings are also evident, notably the absence of a compliant Island Communities Impact Assessment, which contravenes statutory requirements set forth

in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a material omission that inhibits the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for determination.

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

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

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

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

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

Additional Comments

I would like to object to this massive project that would definitely affect the lives of locals on the whole of the west side of Lewis in so many ways. Not only could it affect our way of life through restricting productive fishing areas, but also will have a severe detrimental effect on the marine ecosystem. There is no doubt that with the size of this construction and the ongoing maintenance requirements, this will completely interrupt and potentially destroy the pristine marine habitats that have remained untouched and therefore protected up until now.

I believe the surveys and assessments that have been done in the proposed area are completely inadequate and will lead to a project that cannot be maintained and will end up being abandoned. I also believe the consultation of the community and the environmental assessments have been totally inadequate and therefore this proposal

should not go ahead.

I also believe that there is nowhere near enough proof that this enormous project being built so close to communities won't impact our health. We should not be guinea pigs to see how this will negatively impact the lives and health of those who live here.

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: AA4CBF80

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a comprehensive review of the Environmental Impact Assessment Report along with supporting documents, revealing significant material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, near-pristine natural environment, and rich cultural heritage. Concerns about the scale, proximity, and design of the development bring into question its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for a lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, while several key components of the proposal are not clearly defined. The implementation of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a complete and informed understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not backed by adequate evidence.

There exist notable and serious policy discrepancies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural habitats, cultural heritage, and the health and wellbeing of communities. It does not substantiate that it can meet the national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory criteria necessary for consent and hinder the competent authority's ability to determine that the project is acceptable within policy frameworks.

The magnitude of the proposed development is unprecedented for this area, with large turbines being situated close to the shoreline, raising substantial concerns about landscape capacity, visual dominance, and environmental ramifications. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with policy indicate that the application is incomplete and unable to support a lawful decision. In light of these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies in the Environmental Impact Assessment Report are significant and cannot be overlooked. A major concern is the reliance on a flexible Project Design Envelope that lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and undermines the assessment's integrity, leading to a situation where the presented impacts may not accurately represent the eventual development. As a result, the public and the competent authority are unable to grasp the true environmental effects of the proposal.

Furthermore, the application places a heavy emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that environmental harm will be mitigated later is unacceptable and does not allow for a meaningful evaluation of effectiveness or an assessment of any residual impacts. This postponement of essential information until post-consent stages contradicts the very purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures be clearly established before any determination is made.

Additionally, there are considerable evidential deficiencies present, including gaps in baseline data and limitations in the employed methodology, which rely on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, especially where conclusions indicating negligible or non-significant effects are drawn without sufficient supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that cannot align with statutory requirements.

The application fails to meet the evidential threshold set by the Habitats Regulations, which is necessary to exclude adverse effects beyond reasonable scientific doubt. This raises concerns regarding the precautionary principle, particularly in relation to 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 substantiate 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 significant gaps in baseline data ultimately renders the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, putting the competent authority in a position where it cannot make a well-informed determination based on the information currently available.

ASSESSMENT OF ALTERNATIVES

The application fails to meet the statutory requirements of the Environmental Impact Assessment regime due to an inadequately conducted assessment of alternatives. It does not provide a structured and reasoned comparison of realistic alternatives based on their environmental effects, instead offering a narrative of project evolution. This methodology does not demonstrate that less harmful options have been appropriately

identified, assessed, and selected over more damaging alternatives.

In particular, there is a lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. The application does not prove that the developer has seriously explored the potential for turbine placement further offshore, which could likely mitigate visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact underline the significance of this omission; without such analysis, it cannot be concluded that the proposed siting is the least damaging option available.

The deficiencies are further evident in the assessment of cable routing and landfall. The application lacks sufficient evidence that alternative routes have been thoroughly investigated to avoid or minimise effects on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The absence of a clear avoidance strategy and the failure to conduct a comparative analysis suggest that mitigation by design has not been utilised, resulting in a reliance on post-design measures for mitigation.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This inadequacy represents a failure to adhere to the established mitigation hierarchy, which prevents the competent authority from determining whether more suitable and less harmful alternatives exist. The absence of a robust assessment of alternatives raises questions regarding the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, specifically in relation to the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, reinforcing the conclusion that the application has not been adequately evaluated, thereby hindering a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, particularly concerning the West Lewis coastal environment, which is a sensitive and biologically active marine system. The methodologies employed are inadequate for capturing the presence, behaviour, and habitat use of species, resulting in an insufficient evidential basis for evaluating impacts.

Significantly, the application does not adequately recognise or assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. The failure to consider their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been properly evaluated. This inadequacy compromises any conclusions drawn about the absence of significant effects on this species.

Furthermore, there are notable deficiencies in the assessment of basking sharks, where the reliance on aerial surveys creates significant detection bias, particularly under Atlantic conditions. This methodology likely underestimates the presence of basking sharks when compared to established land-based observations that show frequent use of these waters. The omission of such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws lead to conclusions of negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data also hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the real scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime and National Planning Framework 4, as 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, necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, revealing significant evidence gaps and internal contradictions that compromise its conclusions. Located within key foraging areas and migratory pathways, the site on the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application fails to provide the necessary evidential standard to ensure that these species will not suffer adverse effects.

A critical inconsistency arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction undermines the assessment's reliability and suggests that the presented conclusions lack adequate support from the evidence.

Furthermore, the assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to

underestimate mortality, particularly where baseline data is lacking and the behavioural responses of birds are not fully understood.

The siting of turbines within a recognised migratory corridor adds a further substantial risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately evaluates the long-term consequences of ongoing mortality within this corridor or the potential impacts on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, rendering a lawful conclusion in favour of consent unattainable.

Collectively, these identified deficiencies signify non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely affected puts the proposal in direct opposition to national policy.

In summary, the assessment's reliability is compromised by internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of the potential impacts and culminate in the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented fails to adequately recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. Rather than appreciating the dynamic social, cultural, and spiritual roles that heritage plays, the application reduces heritage to isolated, static elements, overlooking their ongoing significance within the community.

A notable shortcoming is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, which serve as active sites of burial and spiritual practice. The assessment incorrectly categorises these as static features, neglecting their continuous use and the implications of development on their surrounding environment. This misunderstanding leads to an incomplete appraisal of cultural effects, disregarding their integral part in community life.

The absence of consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the community's enduring connection to the coastal environment, further compounds these issues. These aspects are vital to the area's identity yet are entirely overlooked in the assessment, representing a considerable gap. Without addressing these essential elements, the true cultural impact of the

development remains misunderstood.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population, which embodies a distinct cultural identity akin to that of Indigenous Peoples, has not been involved in a Free, Prior and Informed Consent process. This lack of genuine engagement calls into question the validity of the assessment and neglects established principles that govern participation in matters affecting cultural and environmental interests.

Moreover, a critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment prevents the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

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

Ultimately, the disregard for living heritage, intangible cultural values, community rights, and statutory obligations culminates in a significant evidential gap. The cultural impacts of the proposed development have not been sufficiently assessed, and the application lacks the necessary foundation for an accurate evaluation of the genuine cultural cost associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment raises serious concerns regarding its adequacy and legality. Although the developer engaged local residents through focus groups, the comprehensive report remains unpublished, creating a significant evidential gap. This omission obstructs the public and the competent authority from grasping the full scope of social risks highlighted by the developer's own research.

Residents are reportedly experiencing measurable levels of stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts stem from actual engagement rather than speculation. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, thereby hindering the determination of their relevance within the decision-making process.

Furthermore, there is indication that the proposal is viewed as a direct threat to community identity and cohesion, with findings of "cultural loss" emerging from the developer's own investigations. Yet, these social impacts have not been adequately addressed in the main application, nor have they been afforded the necessary

consideration. The withholding of the entire Social Impact Assessment conceals the genuine human and social cost associated with the development.

This situation critically undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functionality are potentially affected. By failing to disclose the complete dataset, the application lacks a comprehensive evidential foundation for weighing benefits against harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid negative impacts, yet the available evidence indicates existing adverse effects that have not been transparently reported. Without the full assessment, it is impossible to establish compliance with this policy.

The procedural ramifications are significant, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This represents a critical omission within the application and demonstrates a failure to meet the evidential standards of the Environmental Impact Assessment framework.

Ultimately, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable evaluation. This situation obstructs a lawful determination and reinforces the conclusion that the application is not substantiated by adequate information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the receiving environment. The coastline of West Lewis, characterised by its open Atlantic horizon and undeveloped nature, exudes a strong sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that is irreversible.

Moreover, the application does not represent the extent of the visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to properly convey the level of impact or its importance in the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage

sites and valuable landscapes. This casts doubt on the assessment's reliability, suggesting that the visual impact may have been understated.

Additionally, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Iconic 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. These sites are treated as isolated elements, failing to recognise their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and their connection to the natural horizon. This represents not just a visual impact but a 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 regarding the protection of natural places and historic assets. The extent of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertions of policy adherence.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resultant change is fundamental and permanent, incapable of being reduced to an acceptable level through any form of mitigation.

Collectively, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks is inadequate, lacking the necessary detail to evaluate the potential environmental effects associated with the proposal. This initiative entails significant seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it leans on mitigation and contingency measures that would only be formulated after consent has been granted, thereby obstructing any meaningful assessment of their adequacy or effectiveness.

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

details on how these risks will be prevented, controlled, or monitored.

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

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

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

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

FISHERIES AND MARINE LIFE

The 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 proposed onshore infrastructure is inadequate and fails to address the full range of impacts associated with what constitutes a single integrated project. There is a fundamental connection between the offshore turbines and the onshore works, yet these components are evaluated in isolation. This fragmented assessment obscures the comprehensive understanding of the environmental and socio-economic repercussions that arise.

The onshore infrastructure encompasses cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access routes through sensitive landscapes. These activities involve excavation in regions of deep peat, specifically within Barvas Moor, which serves as a critical carbon store and is an ecologically fragile habitat. The application lacks a thorough assessment of these impacts, which hinders a complete understanding of the overall environmental footprint of the project.

By not adequately addressing the onshore impacts, the application inhibits a proper

evaluation of cumulative effects. According to the Environmental Impact Assessment process, it is essential that all elements of a project are considered collectively. The current separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain poorly understood.

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

Concerns also arise about the carbon balance related to this proposal. Disturbance of peatland has the potential to release stored carbon, thereby creating a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or provide assurance that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land introduces potential conflicts with established land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises significant doubts about deliverability and the lawfulness of implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

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

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

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

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

TOURISM

The application indicates that 86% of visitors are attracted by the scenery of the Isle of Lewis; however, it does not provide any quantified assessment regarding how large-scale offshore infrastructure might influence visitor numbers, behaviour, or their overall economic contribution. Tourism, which has increased from £65 million in 2017 to over £81.5 million, is crucial to the island's economy as it supports more than 1,000 jobs and accounts for up to 16% of economic activity. The absence of an analysis on how the industrialisation of the seascape and the potential loss of environmental quality could affect Tourism Gross Value Added and the resilience of the wider economy is a critical oversight.

Furthermore, the assessment neglects to acknowledge the vital role that environmental quality plays in tourism, specifically the significance of unspoiled landscapes and dark skies to the visitor experience. The lack of a Dark Skies Assessment exacerbates this shortfall, leaving a considerable gap in understanding the impacts on key emerging markets such as nature-based tourism and astro-tourism.

In an island community where economic diversification is limited, the failure to evaluate tourism impacts has broader implications for local employment, businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly considered, as required under the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, the failure to assess environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This inadequacy hampers a thorough evaluation of the economic effects, leading to the conclusion that the application remains 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.

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: 91066225

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 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 application lacks a structured and evidence-based assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of presenting a reasoned comparison of realistic alternatives concerning their environmental effects, it merely recounts the project's development. This narrative approach fails to demonstrate that less harmful options have been identified and properly evaluated in favour of more damaging ones.

Furthermore, the application does not include a transparent comparison of different offshore locations, development scales, or design configurations. Notably, it does not indicate that the developer has thoroughly explored the option of positioning turbines further offshore, where potential impacts on visual aesthetics, ecology, and the coast could be lessened. The West Lewis coastline's sensitivity and the significant role of proximity to shore in assessing impact mean that the absence of such an analysis undermines any assertion that the proposed siting is the least damaging.

The shortcomings also apply to cable routing and the assessment of landfall, as there is inadequate evidence showing that alternative routes have been investigated to minimise impacts on sensitive areas. This includes regions of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation measures by design have not been utilised, relying instead on mitigation strategies after the design phase.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful site selection, layout, and infrastructure planning. This oversight signifies a failure to adhere to the established mitigation hierarchy, hindering the competent authority's ability to ascertain whether less harmful alternatives are available. Without a thorough assessment of alternatives, it is impossible to conclude that the proposal is sustainable or aligns with policy requirements.

From a policy standpoint, this deficiency raises concerns regarding compliance with the National Planning Framework 4, especially with respect to safeguarding natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that supports the overarching conclusion that the application has not been sufficiently evaluated and cannot receive lawful approval.

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.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the development raises significant concerns regarding the reliability of its ornithological assessment, which is marked by notable gaps in evidence and inconsistencies. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already experiencing declines. However, the application does not adequately demonstrate that these species will not be adversely affected by the proposed development. The turbines are positioned within critical foraging areas and migratory routes, yet the assessment fails to sufficiently evaluate the risks associated with displacement, collision, and habitat loss.

A critical inconsistency exists in the application, as the developer asserts that there will be no significant adverse effects while also presenting a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack the necessary evidential support. Furthermore, the assessment does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis

Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully recognised, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies used may underestimate potential mortality rates, especially in light of incomplete baseline data and an insufficient understanding of species behaviour.

The placement of turbines within a recognized migratory corridor presents additional significant risks, effectively forming a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term consequences of sustained mortality in this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential standard needed to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and renders a lawful conclusion in favour of consent unattainable.

Moreover, the identified deficiencies signify a failure to adhere to the National Planning Framework 4 regarding the protection of biodiversity and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected puts the proposal at odds with national policy.

In summary, the assessment is compromised by internal inconsistencies, methodological flaws, and insufficient evidence. These issues hinder a comprehensive evaluation of the potential impacts, leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely flawed, particularly in its treatment of the West Lewis coastline, which should be viewed as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Rather than recognising these elements, the application adopts a simplified perspective, treating cultural heritage as a collection of isolated, static assets. This approach neglects the active social, cultural, and spiritual roles these sites play within the community.

Significant deficiencies arise in the assessment of culturally important sites, notably the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice. However, they are mischaracterised as static features, with the assessment failing to account for their ongoing use and significance, as well as the potential impacts of development on their surroundings. Such a mischaracterisation leads to an incomplete evaluation of cultural consequences and ignores their integral role in community life.

The assessment also neglects intangible cultural heritage, including the Gaelic language, local traditions, and the deep-rooted relationship between the community and its coastal environment. These elements are vital to the area's identity yet are omitted from the assessment, creating a considerable oversight. Without acknowledging these aspects, it is impossible to truly grasp the cultural implications of the proposed development.

Concerns regarding community rights and engagement are also apparent. The Gaelic-speaking population has a unique cultural identity recognised as characteristic of an Indigenous People. However, the process of Free, Prior and Informed Consent has not been pursued. This lack of meaningful engagement undermines the credibility of the assessment and disregards established principles regarding participation in decisions that affect cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment constitutes a critical procedural failure. This assessment is mandated under the Islands (Scotland) Act 2018, and without it, the competent authority is unable to meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone makes it impossible to proceed lawfully with the proposal.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly concerning the preservation of historic assets and locations. The failure to adequately address both tangible and intangible heritage, alongside the need to acknowledge living cultural practices, represents a clear deviation from policy standards.

In summary, the deficiencies in assessing living heritage, intangible cultural value, community rights, and statutory obligations culminate in a substantial evidential gap. The cultural impacts of the development have not been thoroughly evaluated, and as a result, the application falls short of providing a sufficient basis for assessing the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises significant concerns regarding its social impacts, health, and wellbeing, as the evaluation provided is materially deficient and lacks the necessary transparency for a lawful assessment. Although a Social Impact Assessment was commissioned by the developer, which included focus groups with local residents, the full report remains unpublished. This lack of disclosure creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of the social risks identified in the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as indicated by available summaries. These impacts arise from direct engagement with the community and are therefore not

speculative. However, without access to the complete assessment, proper scrutiny of these findings is unattainable, limiting the ability to ascertain their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with references to “cultural loss” emerging from the developer's findings. Unfortunately, these critical impacts have not been adequately considered in the main application, nor have they been given the appropriate weight they deserve. The failure to disclose the entire Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. Understanding the social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be at stake. The absence of the complete dataset means that the application does not present a thorough evidential basis to assess the balance of benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and mitigate harm; however, the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications of this situation are considerable. The competent authority is unable to carry out a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment 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 inadequacy obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The representation of the visual changes resulting from the application is insufficient. Given the scale and close proximity of the turbines, they are set to dominate the views

from residential zones, historical landmarks, and popular coastal areas. This intrusion would impact visual amenity directly and diminish the essential qualities of naturalness and remoteness. The assessment does not convey the true significance of this impact within the framework of such a sensitive landscape.

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on undefined future measures raises serious concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks

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

Furthermore, there is a lack of clarity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. The absence of robust modelling and well-defined management strategies makes it impossible to ascertain the extent, duration, or ecological repercussions of these impacts. This uncertainty also applies to potential effects on marine species and habitats identified as sensitive in the broader assessment.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate likely environmental effects. The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it defers mitigation and contingency measures to a post-consent stage, hindering any meaningful assessment of their adequacy or effectiveness.

The deficiency of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the evaluation of whether appropriate safeguards are established to respond to pollution incidents. This procedural risk undermines the competent authority's capacity to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation be assessed before consent; without such information, a lawful determination cannot be achieved. The application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts renders the assessment materially deficient. These inadequacies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal raises significant concerns regarding the assessment of fisheries and marine life, which lacks a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast, known for their diverse marine ecosystem and active fishing industry, face potential threats from the proposed development. The application fails to ensure that these habitats and livelihoods will be protected or maintained without considerable disruption.

One major issue is the underlying assumption that fishing activities can be displaced without any repercussions. The application does not provide evidence that alternative

fishing grounds are available or can adequately accommodate the displaced activity. This gap is critical, as such displacement could lead to overfishing in other areas and have broader economic ramifications for the local fishing fleet. The absence of a clear, evidence-based assessment makes it impossible to understand the true impacts on fisheries and local livelihoods.

Moreover, the proposal poses serious risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over a prolonged period is expected to disturb marine life over extensive distances, notably affecting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; however, the application downplays these effects without adequate evidence to support such minimisation.

There is an evident inconsistency in the application, where the necessity for licences to permit harm to European Protected Species is acknowledged, while simultaneously declaring the impacts as negligible. This contradiction compromises the credibility of the assessment and raises questions about compliance with the Habitats Regulations, particularly concerning anticipated harm that would necessitate legal authorisation.

Furthermore, the assessment neglects to account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is crucial to understanding the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and internal inconsistencies culminate in an assessment that is incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a proposed project that lacks a complete assessment of onshore infrastructure, failing to account for the full spectrum of impacts related to an integrated system. The offshore turbines and onshore works are interlinked, yet they have been evaluated separately, leading to a fragmented approach that obscures the overall environmental and socio-economic ramifications.

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

of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive environment. The application does not present a thorough evaluation of these impacts, which impedes a complete understanding of the project's total environmental footprint.

By excluding or postponing the assessment of onshore impacts, the application hinders a proper appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively. However, the disjointed analysis of offshore and onshore elements results in an incomplete comprehension of the combined effects on peatlands, habitats, and communities.

Moreover, there are substantial risks posed to sensitive habitats, such as machair systems and peatland environments that are safeguarded by policy. The application fails to prove that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented, highlighting a clear evidential gap concerning biodiversity protection.

Concerns also arise in relation to carbon balance, as the disturbance of peatland can release stored carbon, potentially incurring a carbon debt that contradicts the aims of renewable energy advancement. The application does not sufficiently address this concern or establish that the overall carbon balance is advantageous.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the requisite consents or processes have been commenced, leading to uncertainties regarding deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife is a critical shortcoming in the Environmental Impact Assessment. The West Lewis coastline is defined by its exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, which will be visible over long distances, is set to create a constant and intrusive “wall of light” across the western horizon, fundamentally disrupting the natural night-time environment.

Furthermore, the application fails to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly significant in light of the value dark skies hold for the region's identity and the growing sector of astro-tourism. The lack of consideration for these impacts marks a considerable gap in the overall landscape and environmental assessment.

Of even greater concern is the lack of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide any lighting impact assessment or a phototaxis study, failing to determine how aviation lighting may impact these species or contribute to increased mortality rates.

This issue is further compounded by the dependence on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a significant deficiency in understanding the ecological impacts.

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

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

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

TOURISM

The assessment concerning the impacts on tourism is inadequate and does not fully consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it does not provide a quantitative evaluation of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

The tourism sector has experienced significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up to

16% of the island's economy. However, the application fails to model the potential impacts that the industrialisation of the seascape and a decline in environmental quality may have on Tourism Gross Value Added and 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 potentially harm an established and expanding sector.

Moreover, the assessment neglects to address the critical role that environmental quality plays in supporting tourism, particularly the significance of unspoiled landscapes and dark skies for enhancing visitor experiences and fostering emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a considerable gap in understanding the impacts on a recognised and growing segment of the local economy.

Given the context of an island community with limited economic diversification, the failure to assess the impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been evaluated in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the need to show net benefits. It also contradicts strategic objectives that prioritise tourism as a growth sector, and it fails to provide sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the combined shortcomings in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and recognising the island's economic dependency result in a significant evidential gap. This limits the ability to conduct a thorough evaluation of the economic effects and supports the conclusion that the application is lacking in completeness.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development, as evaluated against statutory duties, national policy, and evidential standards. It replicates the primary issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is submitted under an enhanced policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A complete and reliable evidential basis for the proposal is lacking. There are significant gaps in baseline data, an undefined design envelope continues to be employed, and there is reliance on unspecified mitigation measures. Additionally, key impact pathways, including nocturnal wildlife, full onshore infrastructure, and effects on tourism, have not been included. Consequently, the Environmental Impact Assessment

remains incomplete, preventing a thorough understanding of likely significant effects or residual impacts.

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

Conflicts with the National Planning Framework 4 are evident within the proposal. It does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been assessed properly, concealing effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke the applicable regulatory provisions to mandate the submission of the outstanding information.

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

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: 1E31806D

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. It is informed by a thorough review of the Environmental Impact Assessment Report and associated documentation, highlighting significant material deficiencies related to planning, environmental concerns, cultural aspects, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a robust evidential foundation necessary for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures the potential for understanding likely significant effects. Furthermore, the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the provided documentation falls short of enabling a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack sufficient supporting evidence.

There are evident and significant conflicts with policy. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and health and well-being. It fails to establish compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These policy conflicts directly challenge the statutory tests required for consent and compromise the capacity of the competent authority to determine the development's acceptability within a policy context.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises considerable concerns about landscape capacity, visual dominance, and overall environmental impact. Taken together, the insufficient information, dependence on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance reveal that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in essential information and does not offer a complete, clear, or trustworthy account of the potential environmental impacts of the proposal. The proposal's use of a flexible Project Design Envelope, which lacks commitment to specific turbine sizes, layouts, or configurations, creates considerable uncertainty. This approach hinders a consistent worst-case scenario analysis, compromising the assessment's integrity and obscuring the true environmental effects from both the public and the competent authority.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought under the premise that environmental damage will be addressed later, which hinders meaningful evaluation of effectiveness or the assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment process, which mandates that likely significant effects and mitigation strategies be clearly established before any determination.

There are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, contributing to scientific uncertainty that cannot be aligned with statutory obligations.

As a result, the application does not satisfy the evidential requirements under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This brings the precautionary principle into play, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including requirements for biodiversity protection and environmental integrity, as it has not been shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the dependence on an undefined design envelope, the absence of specific mitigation measures, and gaps in baseline data lead to an unreliable and incomplete Environmental Impact Assessment Report. These shortcomings prevent a lawful and robust evaluation of environmental effects and leave the competent authority unable to make an informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application lacks a comprehensive assessment of alternatives, which does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental impacts, it provides a narrative detailing the project's evolution. This method fails to demonstrate that less harmful options have been sufficiently identified, evaluated, and chosen over more damaging solutions.

There is a notable absence of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has adequately considered positioning turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impacts, the lack of such analysis prevents any determination that the proposed siting is the least damaging option.

These shortcomings extend to the cable routing and landfall assessment, where there is inadequate evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear avoidance strategy and the lack of comparative analysis suggest that mitigation by design has not been employed, resulting in a reliance on post-design mitigation measures instead.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This indicates a failure to adhere to the established mitigation hierarchy and hampers the competent authority's ability to ascertain whether more appropriate and less harmful alternatives are available. In the absence of a robust assessment of alternatives, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is inadequate, resulting in a lack of a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the methodologies used fall short of capturing essential data on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One critical gap in the assessment is the treatment of otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of how construction disturbances, noise, and increased activity might affect them. Thus, the assessment's conclusions regarding the absence of significant effects on otters are fundamentally

flawed.

The assessment also inadequately addresses basking sharks, relying heavily on aerial surveys which introduce considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to include or give proper consideration to this data results in an incomplete baseline, undermining the reliability of the conclusions reached.

These methodological shortcomings mean that the claims of negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of sufficient baseline data hampers any meaningful evaluation of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions, leaving considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been conducted appropriately. This uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, the granting of consent is not legally justifiable.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the notion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impact is fundamentally flawed and presents significant inconsistencies and gaps in evidence that seriously undermine its findings. The development site is situated within crucial foraging areas and migratory corridors on the west coast of the Isle of Lewis, which hosts internationally significant seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected, failing to meet the required evidential standards.

Moreover, the application contains a fundamental contradiction; it asserts that there will be no significant adverse effects, while simultaneously proposing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by the necessary evidence.

The assessment falls short in demonstrating that seabirds associated with protected areas such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling

techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are already facing severe declines. The methodologies utilised are likely to underestimate mortality rates, especially given the lack of comprehensive baseline data and an incomplete understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional risk, effectively creating a barrier in a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and its potential impacts on species with limited global populations have not been adequately assessed.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to ascertain 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 standard of beyond reasonable scientific doubt has not been reached. This invokes the precautionary principle, which prevents a lawful conclusion in favour of consent.

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

In conclusion, the assessment lacks reliability due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for its approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. Instead of appreciating heritage as an evolving entity with ongoing social, cultural, and spiritual significance, the application adopts a simplistic view that treats it as a collection of isolated, static assets.

There is a critical shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These sites are active areas for burial and spiritual observance, yet the assessment overlooks their current use, meaning, and the potential impacts of development on their environment. This misrepresentation leads to an incomplete understanding of cultural implications, neglecting their integral role in community life.

Moreover, the assessment fails to address intangible cultural heritage elements, including the Gaelic language and traditions, as well as the long-standing relationship the community has with the coastal environment. These components are essential to

the area's identity but are conspicuously absent from the evaluation, resulting in a significant gap. Without acknowledging these factors, the true cultural impact of the development remains obscured.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population embodies a unique cultural identity characteristic of Indigenous Peoples; however, there has been no process for Free, Prior and Informed Consent. This lack of meaningful engagement compromises the assessment's validity and disregards established principles of community involvement in matters affecting cultural and environmental interests.

Compounding these issues is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without such an assessment, the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission is a significant barrier to lawful decision-making.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly diverges from established policy requirements.

Ultimately, the absence of a thorough evaluation of living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential void. The cultural ramifications of the proposed development have not been adequately assessed, and the application fails to deliver a solid foundation for understanding the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is lacking in a full and transparent assessment of social impacts, health, and wellbeing. The developer commissioned a Social Impact Assessment that included focus groups with local residents, but the complete report has not been made public. This creates a significant evidential gap, which hampers both public understanding and the competent authority's ability to assess the social risks identified in the developer's research.

Summaries indicate that local residents are experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts have been sourced from direct engagement and are therefore based on actual experiences. However, without the full assessment being available, the ability to scrutinise these findings is limited, making it difficult to understand their importance in the decision-making process.

Additionally, there is evidence suggesting that the proposal threatens community identity and cohesion, with "cultural loss" noted in the developer's findings. Yet, these impacts have not been properly considered in the main application or afforded the

appropriate importance. The failure to disclose the full Social Impact Assessment obscures the true human and social costs of 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 scale, especially where community character and functioning could be affected. By withholding the full dataset, the application does not present a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. It must promote positive health outcomes and mitigate harm, yet the existing evidence suggests adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be shown.

The procedural implications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission is material within the application and fails to meet the evidential requirements of the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is fundamentally flawed, lacking an adequate representation of the scale of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. The close proximity of large-scale turbines to the shoreline would introduce a continuous and overwhelming industrial presence, fundamentally altering this character and resulting in a permanent and irreversible change to the landscape.

Moreover, the application fails to represent the magnitude of the anticipated visual alterations. The height and closeness of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal locations. This would detrimentally affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately convey this impact or its importance within the context of such a sensitive landscape.

Concerns arise concerning the methodology employed in selecting and presenting visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or the most adverse scenarios, particularly in relation to significant cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been underestimated,

thereby compromising the assessment's reliability.

Additionally, there is a notable shortcoming in the assessment's failure to acknowledge the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these as separate entities rather than understanding their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and severing their link to the natural horizon. This signifies not merely a visual impact but also a wider cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural environments and historic assets. The proposed scale of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be successfully mitigated. Given the size, height, and proximity of the turbines, their presence would be overpowering and inescapable. Consequently, the resulting transformation is not merely capable of being reduced to an acceptable level through mitigation; it is fundamentally and permanently altering the landscape.

Overall, the assessment fails to accurately depict the extent of impact, the sensitivity of the environment, and the interconnected relationships between landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

The assessment of construction and pollution risks is incomplete and fails to provide the necessary detail to evaluate likely environmental effects. The application

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

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

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

FISHERIES AND MARINE LIFE

The application proposes a development that significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support an active fishing industry. However, the proposal does not sufficiently demonstrate how these vital uses and habitats can be protected or maintained in the face of potential disruptions.

A critical concern is the assumption made within the application that fishing activities can be displaced without repercussions. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of withstanding the increased pressure that displacement would create. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. As a result, without an evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal introduces serious risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over an extended timeframe is likely to disturb species over large

distances, notably impacting the local bottlenose dolphin population. Concerns regarding the predicted disturbance to a significant proportion of these dolphins are serious, yet the application appears to downplay these effects without providing adequate supporting evidence.

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

The assessment is lacking in its consideration of cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These issues ultimately hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is notably inadequate, failing to capture the full range of impacts resulting from a single, integrated project. The offshore turbines and the associated onshore works are fundamentally interconnected; however, they have been evaluated separately, leading to a disjointed approach that obscures the true extent of environmental and socio-economic repercussions.

Onshore components entail cabling across designated protected moorland, the establishment of a substation near Stornoway, and the requisite access infrastructure traversing sensitive landscapes. These construction activities involve excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components in

conjunction, yet the division between offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are substantial risks posed to vulnerable habitats, including machair systems and peatland environments, which are under policy protection. The application fails to prove that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant gap in the evidence relating to biodiversity protection.

Moreover, concerns arise regarding the carbon balance associated with the proposal. The disturbance of peatland has the potential to release stored carbon, which could lead to a carbon debt and contradict the goals of renewable energy development. The application does not sufficiently address this concern or demonstrate that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land presents possible conflicts with existing land uses and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, thereby raising doubts about its feasibility and lawful execution.

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

In summary, the disconnection of project components, the absence of a comprehensive assessment, and the insufficient evidence on 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 are vital for the area's environmental quality, cultural identity, and tourism value. The introduction of permanent red aviation lighting, visible over long distances, would create a continuous and intrusive "wall of light" across the western horizon, fundamentally altering the night-time environment. This transformation represents a significant concern as the application fails to assess the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. Given the importance of dark skies for the area's identity and the growth of emerging sectors like astro-tourism, this omission is noteworthy.

Moreover, the application neglects to evaluate the potential impacts on nocturnal wildlife, a critical oversight. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, leading to disorientation and increased risk of collision. The

absence of any lighting impact assessment or phototaxis study means that the proposal fails to consider how the aviation lighting may affect these species or contribute to higher mortality rates.

This lack of evaluation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are at risk of disorientation due to artificial lighting, yet this danger remains unassessed. The failure to collect site-specific night-time data leaves a critical gap in understanding the ecological impacts involved.

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

From a policy standpoint, the lack of assessment contravenes National Planning Framework 4 concerning the protection of natural places and environmental quality. This also undermines the wider assessment of landscape and seascape impacts since the night-time character is an integral aspect of the environment.

Overall, the absence of any analysis regarding dark skies and nocturnal wildlife results in a significant evidential gap. The lack of baseline data, impact modelling, and species-specific examination renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

The application significantly underrepresents the potential impacts on tourism, a crucial sector for the Isle of Lewis economy. This area's tourism thrives on its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. With 86% of visitors attracted by the scenery, the proposal does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has shown remarkable growth, with its contribution rising from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and constitutes up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and the deterioration of environmental quality on Tourism Gross Value Added and the broader economic resilience of the region. Without such crucial analysis, it remains unclear if the proposed development would result in a net economic benefit or if it would jeopardise an already thriving sector.

Furthermore, the evaluation fails to account for the critical role that environmental quality plays in tourism, particularly regarding unspoiled landscapes and dark skies which are vital for visitor experiences and emerging markets such as nature-based

tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a substantial gap in understanding the effects on a recognised and growing segment of the local economy.

Considering the limited economic diversification within this island community, the oversight in assessing tourism impacts has broader implications for employment, local enterprises, and community sustainability. The lack of a compliant Island Communities Impact Assessment means these economic vulnerabilities have not been adequately examined, as required by the Islands (Scotland) Act 2018.

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

In summary, the failure to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the economic dependency of the island culminates in a significant evidential gap. This deficiency hinders a comprehensive evaluation of economic effects and supports the assertion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm demonstrates significant deficiencies that undermine its compliance with sustainable development requirements as mandated by statutory duties and national policy. It echoes the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presently, this application is set against a more rigorous policy framework that emphasises the importance of biodiversity, the protection of peatlands, the integrity of landscapes, and the wellbeing of communities.

A critical examination reveals that the proposal lacks a complete and reliable evidential foundation necessary for determination. Notable gaps exist in baseline data, with the application relying on an undefined design envelope and unspecified mitigation measures. Additionally, crucial impact pathways have been overlooked, including effects on nocturnal wildlife, the full spectrum of onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment fails to adequately address likely significant effects or residual impacts.

Moreover, the application demonstrates procedural shortcomings. The absence of a compliant Island Communities Impact Assessment signifies a breach of statutory obligations under the Islands (Scotland) Act 2018, while the failure to provide a full Social Impact Assessment results in a material omission. These shortcomings inhibit the competent authority from fully evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately protect biodiversity, natural environments, or cultural heritage, nor does it substantiate acceptable impacts on health and wellbeing. Furthermore, the absence of tourism impact modelling fails to demonstrate a net economic benefit. The cumulative effects of offshore and onshore components have not been thoroughly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and hindering a lawful determination of acceptable 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, disruptions to cultural and visual relationships, and repercussions for tourism would result in permanent impacts that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The array of information deficiencies, alongside policy inconsistencies and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should either reject the application on these grounds or exercise the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

The Isle of Lewis is where my father was born and raised, and it remains the anchor for our family. We return every year to visit relatives, walk the hills, enjoy the beaches, and take in the beautiful scenery.

Having witnessed the visual degradation caused by existing onshore developments, I am deeply concerned that this offshore project will further industrialise one of Scotland's last unspoiled skylines. While I support all the environmental and cultural concerns outlined in the sections above, **I wish to add a further, critical point regarding marine navigational safety which is not fully addressed in the standard topics.**

History has shown that offshore wind farms create documented hazards, such as the **Julietta D incident**, where a bulk carrier lost power during a storm and collided with a turbine foundation and transformer platform, causing significant structural damage. Similarly, the **near-disaster involving the tanker Linda Fortuna** saw a massive vessel drift within meters of a North Sea wind farm before tugs could intervene. These

incidents highlight that in the volatile Atlantic waters off the west coast of Lewis, turbines are not just obstacles but active hazards for any vessel experiencing mechanical failure or steering issues. The resulting 'vessel squeeze', radar interference, and the severe complication of search and rescue operations represent physical risks that the community and our emergency services should not have to bear.

In conclusion, the Isle of Lewis is not merely a site for industrial expansion; it is a unique cultural and environmental landscape that supports a way of life deeply connected to the sea. To proceed with a development of this scale, despite the evidential gaps and the clear risks to maritime safety and ecology, would be an irreversible error. I urge the competent authority to prioritize the long-term integrity of our coastline and the safety of those who navigate it by refusing this application 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: F5328BE5

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

Dear Sir/Madam

This objection is formally lodged against the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development's location off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity, raises significant issues. The scale, proximity, and design of the proposal present fundamental concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

An adequate evidential basis for a lawful determination is lacking, as critical environmental data is missing and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined. The flexible design framework utilised prevents a clear understanding of likely significant effects, and without specified mitigation measures, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantive policy conflicts are evident, as the proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

Unprecedented in scale for this location, the proposal features large turbines positioned close to the shoreline, leading to serious concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks sufficient transparency and reliability in conveying the anticipated environmental consequences of the proposal. The implementation of a flexible Project Design Envelope, which does not commit to particular turbine dimensions, layouts, or configurations, introduces considerable

uncertainty. This ambiguity undermines the integrity of the assessment, leading to potential discrepancies between the projected impacts and the actual development, thereby hindering both public understanding and the competent authority's ability to gauge the full extent of environmental effects.

Furthermore, the application is predominantly contingent on mitigation measures, monitoring strategies, and management plans that are not yet established. As a result, consent is requested based on the expectation that environmental harm will be mitigated at a later stage, which obstructs any meaningful evaluation of these measures' effectiveness or a comprehensive assessment of residual impacts. This postponement of critical information to stages following consent is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly defined before determination.

There are notable evidential shortcomings, such as gaps in baseline data, limitations in methodology, and the reliance on assumptions rather than site-specific evidence. These issues lead to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information obstructs a thorough understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be aligned with statutory obligations.

Consequently, the application does not meet the evidential standards stipulated under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes directives related to biodiversity protection and environmental integrity, as it cannot establish that impacts have been comprehensively assessed or that suitable safeguards are in place.

In conclusion, the dependency on an undefined design envelope, the lack of specified mitigation measures, and the inadequacies in baseline data all contribute to the Environmental Impact Assessment Report being both unreliable and incomplete. These deficiencies impede a lawful and thorough evaluation of environmental impacts, leaving the competent authority ill-equipped to make a determination based on the information available.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a serious shortcoming in its assessment of marine ecology and protected species within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies used fail to adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A critical gap in the assessment pertains to otters, which are recognised as a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal areas for foraging and movement. Due to the oversight of their core foraging range and behavioural patterns, the assessment does not adequately evaluate the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions related to the absence of significant effects on this species.

Further issues are evident in the assessment of basking sharks. The reliance on aerial surveys results in significant detection bias, particularly in the challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially in light of established land-based observations indicating their frequent use of these waters. The failure to incorporate or appropriately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws lead to conclusions of negligible or non-significant effects that are based more on assumptions than on robust evidence. The lack of adequate baseline data further hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty regarding the actual scale of risk 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 the assessment of protected species is insufficient. The uncertainty introduced prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, necessitating the invocation of the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already in decline. The ornithological assessment associated with the development proposal is fundamentally flawed, lacking crucial evidence and containing internal contradictions that undermine its conclusions. It fails to demonstrate that these vital species will not be adversely impacted, particularly as the development sits within key foraging areas and migratory routes. There is inadequate evaluation of the implications regarding displacement, collision risk, and habitat loss.

Compounding this issue is a glaring inconsistency within the application; the developer

asserts that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted in scenarios where significant harm is anticipated. This contradiction raises serious doubts about the reliability of the assessment, indicating that its conclusions are unsupported by the available evidence. The assessment does not convincingly show that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected, and it fails to properly account for the significance of these feeding grounds. The reliance on modelling techniques injects further uncertainty, especially concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses are not fully understood.

Moreover, the proposed siting of turbines within a recognised migratory corridor creates an additional and substantial risk, acting as a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term ramifications of sustained mortality within this corridor, nor does it consider the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling inadequacies, means the standard of beyond reasonable scientific doubt has not been met. This situation necessitates the application of the precautionary principle, which precludes a lawful conclusion in favour of consent.

Additionally, the identified deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects places the proposal in direct contradiction to national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These deficiencies obstruct a robust evaluation of potential impacts and lead to the overall conclusion that the application does not fulfill the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal under consideration lacks sufficient assessment of social impacts, health, and wellbeing, which is necessary for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer that included focus groups with local residents, the full report has not been made public. This absence creates a significant evidential gap, hindering both the public and the competent authority from grasping the full range of social risks identified by the developer's research.

Residents are reportedly already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are derived from direct engagement and are thus not speculative. However, without the full assessment being disclosed, it is impossible to properly scrutinise the findings or assess their significance in the decision-making process.

There is further evidence indicating that the proposal is seen as a threat to community identity and cohesion, with a notion of "cultural loss" acknowledged in the developer's findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor given the appropriate consideration they warrant. The lack of access to the complete Social Impact Assessment therefore obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health implications is vital for developments of this nature, especially when community character and functionality may be at stake. The failure to provide the complete dataset means that the application does not present a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and avoid causing harm. Nonetheless, the evidence currently available suggests that there are existing adverse effects that have not been fully disclosed. In the absence of the complete assessment, compliance with this policy remains unproven.

The procedural implications are considerable, as the competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a material flaw within the application and signifies a failure to meet the evidential standards outlined by the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion 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 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 assessment regarding fisheries and marine life is inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. The waters off the West

Lewis coast are home to a varied marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate how these important habitats and uses will be safeguarded without substantial disruption.

A notable concern is the presumption that fishing activity can be displaced without repercussions. There is no evidence provided that indicates alternative fishing grounds are available, easily accessible, or capable of withstanding additional pressures. This absence of information is critical, as such displacement poses risks of overfishing in other areas and could result in broader economic consequences for the local fishing fleet. Without a detailed and evidence-based analysis, understanding the impacts on fisheries and local livelihoods remains elusive.

Furthermore, the proposal presents considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances across extensive areas, affecting species like dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. Nevertheless, the application minimises the significance of these effects without adequate supporting evidence.

There exists a contradiction within the application, wherein the requirement for licences to permit harm to European Protected Species is acknowledged, yet the impacts are described as negligible. This inconsistency undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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 thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application proposes significant onshore infrastructure related to an integrated project involving offshore turbines and associated works. However, the assessment of

the onshore elements is materially incomplete, failing to consider the full extent of impacts. The onshore works encompass cabling through protected moorland, the construction of a substation near Stornoway, and access infrastructure across sensitive landscapes. These activities involve excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As a result, the application does not provide a thorough evaluation of the environmental footprint, preventing a complete understanding of the project's impacts.

The separation of the onshore and offshore components leads to a fragmented approach, which obscures the true scale of environmental and socio-economic effects. This lack of a comprehensive assessment also hinders the ability to evaluate cumulative impacts. The Environmental Impact Assessment process mandates that all elements of a project be considered collectively, yet the current assessment fails to integrate the combined effects on peatlands, habitats, and local communities.

Moreover, there are serious risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The proposal does not adequately demonstrate that impacts on these habitats have been fully assessed, nor does it show that appropriate avoidance measures are in place. This raises a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance associated with the disturbance of peatland, which releases stored carbon and potentially creates a carbon debt that contradicts the aims of renewable energy development. The application inadequately addresses this issue and fails to demonstrate that the overall carbon balance remains positive.

Additionally, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, casting doubt on its deliverability and lawful implementation.

From a policy perspective, the failure to assess the project as a cohesive whole and the inability to demonstrate protection for peatlands, habitats, and land use interests conflict with the National Marine Plan and National Planning Framework 4. This further undermines the application, as it does not show that impacts can be avoided or mitigated.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create an intrusive "wall of light" effect visible over long distances, fundamentally changing the night-time

environment of the West Lewis coastline. This area is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism value. The application lacks any assessment of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors, thereby overlooking the crucial role that dark skies play in the area's identity and in burgeoning sectors such as astro-tourism.

Moreover, there is no evaluation of how this lighting will affect nocturnal wildlife. Sensitive species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are at risk due to phototaxis, which can lead to disorientation and a higher likelihood of collisions. The absence of a lighting impact assessment or a phototaxis study means that the proposal does not consider the potential adverse effects of aviation lighting on these species or the risk of increased mortality.

The reliance on daytime survey data within the ornithological assessment further compounds this issue, as it does not account for nocturnal activity or the associated risks. Other species, including Kittiwakes, that may forage or migrate during the night are also vulnerable to disorientation caused by artificial lighting, yet this risk remains unassessed. This critical gap in site-specific night-time data prevents a comprehensive understanding of the ecological impacts.

Without an assessment of these nocturnal impacts, it is impossible to ascertain whether protected species or designated sites could be adversely affected. The evidential standard required to demonstrate no adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 regarding the safeguarding of natural spaces and environmental quality. It diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a vital component of the environment.

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

TOURISM

The assessment of the proposed development lacks essential detail regarding its potential impacts on tourism, a crucial sector for the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism on the island has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. However, the application does not explore how the industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added or the resilience of the wider economy. This lack of analysis leaves uncertainty as to whether the development would yield a net economic benefit or adversely affect an already thriving sector.

Additionally, the assessment overlooks the significance of environmental quality in sustaining tourism, particularly the value of unspoiled landscapes and dark skies to the visitor experience. Emerging markets such as nature-based tourism and astro-tourism are also not addressed. The absence of a Dark Skies Assessment further highlights this shortcoming, creating a notable gap in understanding the potential impacts on a vital segment of the local economy.

In an island community with limited economic diversification, the neglect to assess tourism impacts poses broader consequences for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment indicates that these economic vulnerabilities have not been scrutinised as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially regarding economic impact and the need to establish net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to furnish adequate evidence for the competent authority to evaluate the economic implications of the proposal.

Collectively, the deficiencies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and considering the island's economic reliance result in a substantial evidential void. This gap hinders a thorough assessment of the economic consequences and contributes to the conclusion that the application is fundamentally incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed excessively industrial. Presenting this application within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing does not rectify the underlying deficiencies.

The evidential basis for the proposal is incomplete and unreliable. Critical gaps in baseline data are evident, as is the continued utilisation of an undefined design envelope. Furthermore, the reliance on unspecified mitigation measures and the omission of significant impact pathways, such as those affecting nocturnal wildlife,

onshore infrastructure, and tourism, contribute to an Environmental Impact Assessment that is fundamentally inadequate. This lack of thoroughness hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural failures are also apparent. The absence of a compliant Island Communities Impact Assessment contravenes statutory obligations under the Islands (Scotland) Act 2018, while the failure to fully disclose the Social Impact Assessment constitutes a significant omission. Such deficiencies inhibit the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Furthermore, the proposal is at odds with National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been shown to be acceptable, and there is a lack of evidence regarding net economic benefits, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been properly assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals reveal inconsistencies. The evidential threshold required to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been satisfied, thereby engaging the precautionary principle and inhibiting lawful conclusions regarding acceptable impacts.

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

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

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

Additional Comments

As a regular visitor to the OH I am shocked and disappointed to see that wind turbines were potentially being put into the waters there.

I do not believe there has been enough research on the damage this can cause marine

life. The turbines are going to emit a low frequency into the waters, where is the evidence to prove it does not impact marine life.

I am also concerned about the visual impact on these beautiful islands. Wind turbines have lights on them at night, red flashing ones - and they also have white lights at the bottom - these are on constantly during the night spoiling any view! This is worse during the daytime as you can see rows of them.

If, there is a significant need for them, surely they can be placed somewhere differently that does not have such a visual impact.

My final point is what about the unknown impact to humans? There does not appear to be any factual research that suggests wind turbines do NOT negatively impact humans living close by and with only a 6km distance these are going to be close.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 5EE1D88E

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. A detailed review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The development site is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles are paramount due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is missing, with baseline information being limited and inconsistent, leaving key elements of the proposal undefined. The flexible design framework impedes a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures hampers the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects, which are unsupported by robust evidence.

There are substantial policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent, hindering the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, featuring large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, the evidential weaknesses, and the clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these conditions, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a comprehensive, transparent, or reliable overview of the proposal's likely environmental effects. Central to this inadequacy is the use of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This approach introduces considerable uncertainty, hindering the consistent application of a worst-case scenario, thereby undermining the integrity of the assessment. Consequently, the impacts outlined may not accurately represent the development that will ultimately be constructed, restricting both the public's and the competent authority's ability to gauge the true extent of environmental effects.

Additionally, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unarticulated at this stage. Seeking consent based on the premise that environmental harm will be mitigated subsequently obstructs a meaningful evaluation of effectiveness or the assessment of residual impacts. Such a deferral of vital information to post-consent phases is procedurally unacceptable, contradicting the essential purpose of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation be clearly established prior to determination.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These issues contribute to uncertainty regarding the scale and significance of impacts, particularly where findings of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot align with statutory requirements.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is significantly flawed and does not provide a comprehensive understanding of the

ecological receptors in the West Lewis coastal environment. This area is known for its biological sensitivity and activity, yet the baseline data available is insufficient, and the methodologies employed fail to accurately capture essential details regarding species presence, behaviour, and habitat usage. Consequently, the assessment lacks a reliable evidential foundation for evaluating potential impacts.

A notable shortcoming is the inadequate recognition of otters, classified as a European Protected Species. The application does not effectively assess their active utilisation of coastal regions for foraging and movement. This oversight in considering their core foraging range and behavioural tendencies means that potential impacts from construction disturbances, noise, and increased human activity have not been properly evaluated, undermining claims regarding the lack of significant effects on this species.

Additionally, there are shortcomings in the evaluation of basking sharks, primarily due to reliance on aerial surveys, which are prone to significant detection bias under Atlantic conditions. This approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate these waters are frequently used by the species. The failure to incorporate relevant data further contributes to an incomplete baseline and diminishes the credibility of the conclusions drawn.

These methodological deficiencies imply that assertions of negligible or non-significant effects are based on assumptions rather than substantiated evidence. The absence of adequate baseline data also hinders the ability to conduct meaningful assessments of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the criteria set forth by the Environmental Impact Assessment framework and the National Planning Framework 4, as it fails to properly identify and assess protected species. The uncertainty introduced by these deficiencies prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment untrustworthy. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the overall conclusion that the application does not possess a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the ornithological assessment associated with this application is significantly flawed, presenting substantial gaps in evidence and internal inconsistencies that undermine its

conclusions. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the potential implications of displacement, collision risk, or habitat loss for these species.

A critical contradiction arises within the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessitated only when significant harm is anticipated. This inconsistency raises questions about the assessment's reliability and suggests that the conclusions drawn are not substantiated by the supporting evidence. Furthermore, the assessment fails to provide sufficient information regarding the seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, and does not fully consider the importance of these feeding grounds. The reliance on modelling approaches introduces further uncertainty, especially for species that are in severe decline, such as Kittiwakes and Fulmars. The methodologies used likely underestimate mortality rates, particularly where baseline data is lacking and behavioural responses remain unclear.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not adequately address the long-term implications of sustained mortality in this corridor or the potential consequences for species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine 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 fulfilled. This invokes the precautionary principle and prevents a lawful conclusion in favour of consent. Additionally, the identified deficiencies constitute a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will remain unaffected places the proposal at odds with national policy.

Overall, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These issues hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

There are additional concerns related to community rights and engagement. The Gaelic-speaking community possesses a unique cultural identity recognised as having characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental matters.

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not resulted in the publication of the full report. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified in the developer's own research.

Available summaries reveal that residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed

development. These impacts stem from direct engagement and are therefore grounded in fact, rather than speculation. However, the lack of access to the full assessment restricts proper scrutiny of the findings, limiting the capability to ascertain their significance in the decision-making process.

The proposal is also perceived as a direct threat to community identity and cohesion, with findings from the developer indicating a risk of “cultural loss.” Despite this, such impacts have not been sufficiently incorporated into the main application or given due consideration. Consequently, the withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency 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 may be at stake. The failure to provide the complete dataset results in an incomplete evidential basis necessary for assessing the balance between benefits and detriments.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the available evidence indicates adverse effects that remain undisclosed. Therefore, without the full assessment, compliance with this policy cannot be established.

The procedural ramifications are significant, as the competent authority is unable to carry out a robust socio-economic and health evaluation without access to the complete 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.

Ultimately, the non-disclosure of the full Social Impact Assessment, alongside evidence of existing adverse impacts, leads to an incomplete and unreliable assessment. This situation precludes a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape in the application is inadequate and does not accurately portray the extent of change nor the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, lack of development, and pronounced sense of remoteness. The proposed installation of large-scale turbines in close proximity to the shoreline would establish a continuous and overwhelming industrial presence, fundamentally transforming this character and resulting in a permanent alteration of the landscape.

There are significant concerns regarding the methodology used to select and present

visual viewpoints. Evidence indicates that these viewpoints might not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning notable cultural heritage sites and valuable landscapes. This raises the risk that the assessment has understated the magnitude of visual impact, which compromises the reliability of the findings.

Furthermore, the application fails to recognise the interconnectedness of the landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these sites as separate entities, neglecting their interdependence, and thus providing an incomplete picture of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural spaces and historic assets. The scale of the proposed change conflicts with the requirement to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case assessment further calls into question compliance with relevant policies.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be assertive and inescapable. Consequently, the change introduced would be fundamental and permanent, not amenable to acceptable mitigation efforts.

In summary, the assessment fails to accurately capture the magnitude of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a dependable evaluation and affirm the conclusion that the proposal is at odds with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks essential detail needed to thoroughly assess construction and pollution risks, rendering it materially deficient. It involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures that are to be developed after consent has been granted, which prevents any meaningful evaluation of their effectiveness or adequacy.

This reliance on undefined future measures raises serious concerns, particularly considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to

contamination and sediment disturbance. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it does not 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 generated by seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of these activities. This uncertainty applies to potential effects on marine species and habitats that have already been identified as sensitive in broader assessments.

Additionally, the absence 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 available to address potential pollution incidents. This creates procedural risks and undermines the ability of the competent authority to effectively assess the environmental protection measures at the stage of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant likely effects and necessary mitigation measures must be evaluated prior to the granting of consent; the absence of such information means that a lawful determination cannot be made. Furthermore, the application fails to show compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient detailed management plans, and uncertainty about potential impacts collectively demonstrate the inadequacy of the assessment. These shortcomings obstruct a comprehensive evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of marine life and fisheries. There is an inadequate evaluation of the ecological and socio-economic effects related to the waters off the West Lewis coast, which are home to a diverse marine ecosystem and a thriving fishing industry. This assessment does not adequately address whether these habitats and activities can be safeguarded from disruption.

A major concern lies in the assumption that displacing fishing activity will not have adverse effects. The application fails to provide evidence that alternative fishing grounds are available and can handle the increased pressure. This lack of information is crucial, as the potential for overfishing in other areas could threaten the local fishing fleet's economic viability. Without a thorough and evidence-based evaluation, the impacts on fisheries and local livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise generated by construction activities. The anticipated use of high-energy hammer piling over a prolonged period is likely to disturb marine life across extensive areas, which includes species such as dolphins. The potential disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these impacts without adequate justification.

There is a notable inconsistency within the application, acknowledging the need for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where anticipated harm requires legal approval.

Moreover, the assessment overlooks the cumulative impacts that arise from multiple factors, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive analysis of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which undermines any assertion that the proposal aligns with the principles of sustainable development.

Overall, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application result in an incomplete and unreliable assessment. These shortcomings hinder a proper evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The 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 proposal introduces permanent red aviation lighting that is visible over long distances along the West Lewis coastline, which is characterised by exceptionally dark skies. These dark skies play a crucial role in the area's environmental quality, cultural identity, and tourism value. The lighting would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

There is a significant omission in the Environmental Impact Assessment as the application does not assess the impact of this lighting on visual amenity, landscape character, or the experience of residents and visitors. This oversight is particularly concerning given the importance of dark skies to the area's identity and to emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts results in a clear gap 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 highly sensitive to artificial lighting, which can result in disorientation and increased collision risks. The application fails to include any lighting impact assessment or phototaxis study, neglecting to evaluate how aviation lighting may affect these species or lead to increased mortality.

The reliance on daytime survey data in the ornithological assessment further compounds this omission, as it does not capture nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, are vulnerable to disorientation from artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a critical gap in understanding ecological impacts.

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

From a policy standpoint, the omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, it undermines the broader assessment of landscape and seascape impacts, given that night-time character is an integral part of the environment.

Overall, 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 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 raises significant concerns regarding compliance with sustainable development principles, as mandated by statutory obligations, national policy, and evidential requirements. The application mirrors the fundamental issues that led to the previous rejection of the Lewis Wind Power proposal in 2008, highlighting the unacceptable scale of industrialisation. This current proposal is presented within a more robust policy environment that emphasises the importance of biodiversity, peatland conservation, landscape preservation, and community health.

There are substantial deficiencies within the application that undermine its evidential basis for determination. Specifically, the lack of comprehensive baseline data, the ongoing use of an undefined design envelope, and reliance on unspecified mitigation measures all contribute to a flawed assessment. Additionally, the failure to account for key impact pathways, such as effects on nocturnal wildlife, the full extent of onshore infrastructure, and potential impacts on tourism, renders the Environmental Impact Assessment incomplete. As a result, the likely significant effects and residual impacts remain poorly understood.

Furthermore, procedural inadequacies are evident in the application. The omission of a

compliant Island Communities Impact Assessment breaches the statutory duty imposed by the Islands (Scotland) Act 2018. Additionally, the failure to provide the full Social Impact Assessment constitutes a material shortcoming. Such lapses inhibit the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for consideration.

Conflicts with National Planning Framework 4 are clear, as the proposal fails to adequately protect biodiversity, natural environments, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of modelling related to tourism impacts. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties persist regarding environmental risks, which could be significant. Assessments pertaining to marine ecology, seabird populations, protected species, and marine mammals remain incomplete and occasionally contradictory. The evidential threshold necessary to eliminate the possibility of adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and hinders a lawful assessment of impact acceptability.

The proposal would bring about considerable and irreversible alterations to a notably sensitive landscape. The industrial development of the coastline facing the Atlantic, the erosion of dark skies, the disruption of cultural and visual connections, and adverse effects on tourism all signify permanent changes that cannot be adequately mitigated.

In conclusion, the application stands as both procedurally and substantively inadequate for determination. The extensive information gaps, coupled with conflicts with policy and unresolved environmental concerns, hinder the possibility of a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke relevant regulatory provisions to demand the submission of necessary information.

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

Additional Comments

The impact of wind farms are not environmentally friendly, impact on local wildlife and marine is very detrimental, tourism will fall as people want to look at our beautiful country and not ugly metal structures

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: 6FC50F58

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 application fails to provide an adequate evidential basis for a lawful determination, as critical environmental data is missing, baseline information is limited and inconsistent, and key aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while the unspecified mitigation measures mean their effectiveness cannot be assessed. Consequently, the documentation does not enable a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not supported by robust evidence.

There are clear and substantive policy conflicts 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 fails to demonstrate that national requirements to protect biodiversity, climate interests, and environmental integrity can be met. These conflicts directly impact the statutory tests required for consent and undermine the capacity of the competent authority to determine that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, as large turbines are positioned in close proximity to the shoreline. This raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In such circumstances, the precautionary principle must apply. The proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the proposal raise fundamental concerns about its compatibility with statutory requirements, national policy, and the principles of sustainable development.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents serious deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This uncertainty hampers the application of a worst-case scenario assessment, which is

essential for understanding the true environmental impacts. Consequently, both the public and the competent authority are left uninformed about the actual extent of these effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to adhere to the established mitigation hierarchy, resulting in an inadequate demonstration that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This deficiency hampers the competent authority's ability to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

There is a lack of transparent and evidence-based evaluation concerning alternative offshore locations, development scales, and design configurations. Notably, the application does not indicate that the developer has adequately considered the option of situating turbines further offshore, where potential visual, ecological, and coastal impacts would likely be mitigated. The West Lewis coastline is highly sensitive, and proximity to shore plays a crucial role in determining impact; thus, the absence of such analysis undermines any assertion that the proposed siting is the least damaging option.

Furthermore, the evaluation of cable routing and landfall assessment reveals insufficient evidence that alternative routes have been thoroughly examined to prevent or lessen impacts on sensitive receptors, including culturally significant sites such as Barvas Cemetery. The absence of a clear strategy for avoidance, coupled with a lack of comparative analysis, suggests that mitigation by design has not been appropriately applied, leading instead to an over-reliance on post-design mitigation measures.

From a policy standpoint, these shortcomings significantly undermine adherence to National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and the wellbeing of communities. The absence of a structured, comparative assessment represents a material omission that contributes to the overarching conclusion that the application has not undergone adequate scrutiny and cannot support a lawful determination. The assessment of alternatives is materially inadequate and does not satisfy the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured, reasoned comparison of realistic alternatives based on environmental effects, the application presents a narrative account of project evolution, failing to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment fails to adequately identify and evaluate protected species, specifically otters, which are a European Protected Species. The application does not recognise their foraging and movement patterns along the coast. This oversight means that the potential impacts from construction activities, noise, and increased human presence have not been properly assessed. Consequently, the conclusions regarding the lack of significant effects on otters are not credible.

The methodologies used in the assessment are also problematic, particularly in relation to basking sharks. Aerial surveys are relied upon, which can create a significant detection bias, especially under Atlantic conditions. This approach is likely to underestimate the presence of basking sharks, especially when compared to established observations from land that show frequent use of these waters. The failure to properly consider this data leads to an incomplete understanding and compromises the conclusions drawn.

There are broader implications arising from these methodological deficiencies. The

conclusions that suggest negligible effects are based on assumptions rather than strong evidence. Furthermore, the lack of comprehensive baseline data limits the ability to assess cumulative and indirect impacts on marine species, particularly considering seasonal variations and the interactions within the wider ecosystem. This introduces uncertainty about the actual risks to marine habitats and species.

From a regulatory viewpoint, the application does not adhere to the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4. The failure to adequately identify and assess protected species means that uncertainties about adverse effects cannot be dismissed with reasonable scientific certainty, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

Overall, the assessment is rendered unreliable due to incomplete baseline data, flawed methodologies, and unsupported conclusions. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a solid evidential basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development presents significant flaws that undermine its conclusions, particularly concerning the severe decline of seabird populations on the west coast of the Isle of Lewis, which are internationally important. The application fails to provide the necessary evidence to demonstrate that these species will not be adversely affected, especially given that it is situated within critical foraging areas and migratory pathways. Important risks such as displacement, collision, and habitat loss have not been adequately evaluated.

A critical inconsistency arises within the application, where the developer claims no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only be necessary when significant harm is anticipated. This contradiction casts doubt on the credibility of the assessment, revealing that its conclusions lack support from solid evidence. The study does not adequately protect seabirds linked to designated sites, including the Lewis Peatlands and St Kilda, failing to fully account for the significance of these feeding grounds. The reliance on modelling further introduces uncertainty, particularly regarding species like Kittiwakes and Fulmars, which are in sharp decline. Methodologies employed are likely to underestimate mortality rates, particularly due to incomplete baseline data and a lack of understanding regarding behavioural responses.

Additionally, the placement of turbines within an established migratory corridor poses an alarming risk by creating an obstacle along a primary flight path used by birds migrating between the United Kingdom and Iceland. The application does not sufficiently consider the long-term implications of persistent mortality within this corridor or the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the necessary evidential

threshold to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside 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, rendering any conclusion in favour of consent unlawful.

Moreover, the identified deficiencies reflect a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to show that internationally significant seabird populations will not be adversely affected directly conflicts with national policy.

Overall, the assessment's reliability is compromised by internal contradictions, methodological flaws, and insufficient evidence. These issues hinder a thorough evaluation of the impacts and affirm that the application does not satisfy the legal requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly concerning the West Lewis coastline, which is a living cultural landscape where environment, language, tradition, and community are interconnected. The application treats heritage as isolated and static rather than recognising its ongoing social, cultural, and spiritual significance within the community.

There is a significant deficiency in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial and spiritual places, yet they are mischaracterised as static features. This approach neglects their continued use and meaning, which impacts the understanding of development effects on their setting.

Additionally, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the community's longstanding relationship with the coastal environment. These elements are essential to the area's identity, yet they are completely absent from the evaluation, which is a major omission. Without accounting for these factors, the cultural impacts of the proposed development cannot be fully understood.

There are also important concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity recognised as part of Indigenous Peoples, but the absence of a Free, Prior and Informed Consent process undermines the validity of the assessment. This lack of meaningful engagement does not align with established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural flaw is the lack of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This assessment is necessary for the competent authority to evaluate the social, cultural, and economic effects on the

island community. Its absence alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The failure to address both tangible and intangible heritage, as well as to acknowledge living cultural practices, signifies a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to disclose the full Social Impact Assessment raises serious concerns regarding the adequacy of the application and its adherence to the necessary legal standards for evaluation. Although the developer undertook a Social Impact Assessment that included focus groups with local residents, the complete report remains unpublished. This lack of transparency results in a significant evidential gap, leaving both the public and the competent authority unable to grasp the full extent of the social risks highlighted in the developer's own research.

Available summaries reveal that residents are experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts have been identified through direct engagement and are not merely conjectural. However, the absence of the full assessment hampers proper scrutiny of these findings and diminishes the ability to assess their significance in the decision-making process.

The proposal is also perceived as a threat to community identity and cohesion, with references to "cultural loss" found within the developer's own findings. Yet, these impacts have not been thoroughly incorporated into the main application or given adequate weight. The withholding of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. Without the complete dataset, the application fails to provide a full evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, the existing evidence points to adverse effects that have not been fully disclosed. In the absence of the complete assessment, demonstrating compliance with this policy is impossible.

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

In conclusion, the combination of non-disclosure of the complete Social Impact Assessment and evidence of existing negative impacts renders the assessment incomplete and unreliable. This situation hinders a lawful determination and strengthens the argument that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application inadequately reflects the scale of visual change that would result from the introduction of large-scale turbines close to the shoreline. This oversight is significant, given that the West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The proposed turbines would create a continuous industrial presence that fundamentally alters this character and leads to a permanent and irreversible transformation of the landscape.

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

Moreover, there is a critical deficiency in assessing the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape setting, connected visually and spatially to the Atlantic horizon. The application fails to acknowledge this interdependence, treating these sites as isolated assets. This leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of change posed by the proposal is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. Additionally, the absence of a thorough worst-case assessment further undermines any

assertion of compliance with relevant policies.

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 reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to incomplete assessments of construction and pollution risks. The lack of fully developed Construction Environmental Management Plans and Pollution Prevention Plans means there is insufficient detail to assess likely environmental effects. Substantial seabed preparation and installation work will occur in a high-energy Atlantic environment, yet mitigation and contingency measures are only intended to be created after consent is granted. This approach prevents any real evaluation of their adequacy or effectiveness.

The West Lewis coastline features clean coastal waters and crucial habitats that can be severely impacted by sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored. There is also significant uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clear management strategies, it is impossible to ascertain the potential extent, duration, or ecological consequences of these impacts, particularly on the sensitive marine species and habitats identified in the wider assessment.

Moreover, 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 appropriate safeguards are available to address pollution events. This situation creates procedural risk and limits the competent authority's capacity to assess environmental protection measures prior to determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation strategies must be evaluated before consent is granted. The absence of this information means that a lawful determination cannot be achieved. Furthermore, the application fails to meet policy requirements concerning environmental protection and water quality.

In conclusion, the overall absence of defined mitigation measures, detailed

management plans, and clarity regarding potential impacts creates a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks, supporting the assertion 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 current application does not adequately address the ecological or socio-economic impacts associated with its proposal. It fails to demonstrate how these vital habitats and activities can be preserved without causing significant disruption.

A critical flaw in the assessment is the assumption that fishing activities can simply be moved without any consequences. The application lacks evidence to suggest that alternative fishing grounds are available or that they could sustain the additional pressure resulting from this displacement. This oversight is crucial, as it could lead to overfishing in other areas and have detrimental economic effects on the local fishing fleet. Without a solid evidence base, the potential impacts on fisheries and livelihoods remain unclear.

The proposal poses considerable risks to marine species, particularly due to the underwater noise created during construction. The use of high-energy hammer piling for extended periods is likely to disturb marine life over significant distances, particularly affecting populations such as dolphins. The anticipated impact on a substantial portion of the local bottlenose dolphin population raises serious issues, yet the application inadequately addresses these concerns, lacking the necessary supporting evidence.

Additionally, there is an evident inconsistency within the application regarding the need for licenses to permit harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction severely undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially where expected harm necessitates legal approval.

Moreover, the assessment overlooks cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

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 existing marine users or mitigate unacceptable impacts on marine biodiversity, thus obstructing any argument that the proposal aligns with sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not account for the full impacts of what constitutes a single integrated project. The offshore turbines and onshore works are interdependent but are evaluated separately, leading to a fragmented understanding of the environmental and socio-economic effects.

Onshore activities include cabling across protected moorland, construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, especially within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a comprehensive assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By not assessing onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be reviewed together. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully clear.

There are significant risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not show that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been taken. This creates a gap in evidence regarding biodiversity protection.

The proposal also raises issues related to 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 concern or prove that the overall carbon balance remains positive.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence that the necessary consents or processes have been started, raising concerns about the project's deliverability and legal compliance.

From a policy standpoint, the failure to evaluate the project as a whole and to show protection 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 project components, lack of thorough assessment, and

absence of evidence on environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful decision.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider dark skies and nocturnal wildlife, representing a serious oversight. The proposed development would introduce permanent red aviation lighting that would be visible over long distances. This would create an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to emerging tourism sectors like astro-tourism, this omission is particularly concerning. The application also neglects to evaluate the effects on nocturnal wildlife, including sensitive species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are at risk of disorientation and increased collision due to artificial lighting. The lack of any lighting impact assessment or phototaxis study means the potential effects on these species and their mortality risk remain unexamined.

This gap is made worse by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, known to 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 creates a critical void in understanding ecological impacts.

Without evaluating these nocturnal impacts, it is impossible to determine if protected species or designated sites would face adverse effects. The evidential standard needed to exclude adverse effects beyond reasonable scientific doubt is not met, triggering the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It undermines the comprehensive assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

TOURISM

The assessment concerning tourism impacts is notably lacking and does not adequately examine the economic and social repercussions for a vital component of the Isle of Lewis's economy. The region's tourism relies heavily on its wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. The application recognises that 86% of visitors are attracted by the scenery, yet it does not provide any quantifiable analysis of how extensive offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Tourism has experienced remarkable growth, climbing from £65 million in 2017 to over £81.5 million, and it supports more than 1,000 jobs, representing up to 16% of the island's economy. However, the application fails to model how the industrialisation of the seascape and the consequent degradation of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience. Without this analysis, it remains unclear if the proposed development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in bolstering tourism. This includes the vital role of unspoiled landscapes and dark skies in enhancing visitor experiences, particularly for 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 impacts on a recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the oversight in assessing tourism impacts has broader ramifications for employment, local businesses, and the sustainability of the community. The failure to provide a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated, as mandated under the Islands (Scotland) Act 2018.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding sustainable development and does not meet the necessary statutory duties. It mirrors the issues that caused the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Despite being

submitted under a more stringent policy framework that emphasises biodiversity and community wellbeing, it fails to provide a comprehensive evidential basis for assessment.

Critical gaps in baseline data and reliance on an undefined design envelope undermine the application. There are also unspecified mitigation measures and significant omissions, such as impacts on nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment remains incomplete, hindering a thorough understanding of significant effects and residual impacts.

Additionally, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, and the non-disclosure of the full Social Impact Assessment is a substantial omission. These issues prevent the competent authority from effectively evaluating impacts on community wellbeing and cultural identity, making the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, failing to safeguard biodiversity, natural places, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to inadequate tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, complicating assessments related to peatlands, carbon balance, and crofting land.

The environmental risks associated with this proposal are uncertain and potentially significant. Evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The application does not meet the evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt, thereby activating the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

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

In conclusion, the application is procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy inconsistencies and unresolved environmental risks, obstructs a lawful, evidence-based decision. It is essential for the competent authority to refuse consent for the Spiorad na Mara Offshore Wind Farm application or require the submission of the missing information.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 7F1B75B2

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, rich cultural identity, and near-pristine environment. The scale and design of this application raise serious concerns regarding its adherence to statutory requirements, national policy, and sustainable development principles.

A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals that critical environmental data is missing, and baseline information is both limited and inconsistent. Key aspects of the proposal are not clearly defined, and the flexible design framework leaves uncertainty regarding potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, making claims of negligible or non-significant effects unsupported by robust evidence.

There are substantial policy conflicts present as well. The application appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests necessary for consent and challenge the competent authority's ability to determine that the development is acceptable from a policy perspective.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and transparency regarding the likely environmental effects of the proposal. One critical issue is the adoption of a flexible Project Design Envelope,

which lacks specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and hinders a consistent worst-case scenario application. As a result, the impacts outlined may not accurately represent the development as constructed, limiting both public and competent authority understanding of the true environmental effects.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. This reliance implies that consent is sought on the premise that any environmental harm will be addressed at a later stage, obstructing a meaningful evaluation of their effectiveness or assessment of residual impacts. The postponement of essential information to post-consent phases is procedurally unacceptable, contradicting the Environmental Impact Assessment regime's purpose, which mandates that significant effects and mitigation measures are clearly established prior to decision-making.

The assessment further suffers from considerable evidential shortcomings, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These shortcomings engender uncertainty about the scale and significance of the impacts, especially where negligible or non-significant effects are concluded without substantial supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

Consequently, the application does not satisfy the evidential standard outlined in the Habitats Regulations, which necessitates excluding adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, including obligations concerning biodiversity protection and environmental integrity, as it has not been established that impacts have been fully assessed or that suitable safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data contribute to the unreliability and incompleteness of the Environmental Impact Assessment Report. These deficiencies hinder a lawful and robust evaluation 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 assessment pertaining to marine ecology and protected species lacks completeness and reliability, failing to present a thorough understanding of ecological receptors in the West Lewis coastal environment, which is known for its biological sensitivity and activity. The methodologies employed do not effectively capture the presence, behaviour, and habitat utilisation of species, leading to an insufficient evidential basis for evaluating potential impacts.

A significant gap exists concerning otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their utilisation of coastal zones for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the possible impacts of construction disturbances, noise, and increased activity have not been sufficiently examined, thereby undermining any assertions about the absence of significant effects on this species.

Deficiencies are also evident in the evaluation of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, which likely results in an underestimation of their presence, especially when compared with established land-based observations that demonstrate frequent usage of these waters. The failure to incorporate or thoroughly consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings imply that conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs meaningful evaluations of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty about the genuine level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria established by the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been adequately undertaken. The uncertainty introduced prevents the dismissal of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant flaws in its ornithological assessment, which suffers from major gaps in evidence and contradictions that undermine its validity. Located in crucial foraging areas and migratory pathways on the west coast of the Isle of Lewis, the development poses a threat to internationally important seabird populations, many of which are already in decline. However, the application fails to meet the evidential standards necessary to assure that these species will not face adverse effects.

A troubling inconsistency is evident within the submission, as the developer asserts that there will be no significant adverse effects while concurrently making a case for Habitats Regulations derogation, a process invoked only when significant harm is

anticipated. This contradiction raises serious doubts about the reliability of the assessment, suggesting that its conclusions lack robust support from the available evidence.

Furthermore, the assessment inadequately addresses the impact on seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The critical importance of their feeding grounds is not sufficiently considered, and the reliance on modelling introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, which are already experiencing severe declines. The methodologies used are likely to underestimate mortality rates due to incomplete baseline data and a lack of comprehensive understanding of the species' behavioural responses.

The placement of turbines within a recognised migratory corridor poses additional risks, creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not thoroughly evaluate the long-term consequences of potential sustained mortality in this corridor or the effects on species with already small global populations.

Regulatory standards have not been met, as the application fails to establish, beyond reasonable scientific doubt, that there will be no adverse effect on the integrity of protected sites. The contradictory findings, combined with data gaps and limitations in modelling, engage the precautionary principle, hindering a lawful conclusion in support of consent.

Moreover, the deficiencies highlighted indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that globally significant seabird populations will remain unaffected brings the proposal into direct conflict with national policy.

In summary, the assessment's internal inconsistencies, methodological shortcomings, and insufficient evidence collectively render it unreliable. These issues prevent a thorough evaluation of the potential impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A major shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices, yet they are mischaracterised as mere static features. This oversight neglects their continuing use and meaning, as well as the impact that

development may have on their surroundings. Such misrepresentation leads to an incomplete assessment of cultural implications and overlooks their integral role in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency and comprehensiveness of the assessment regarding social impacts, health, and wellbeing associated with the proposed development are critically lacking. Although the developer has commissioned a Social Impact Assessment that included focus group discussions with local residents, the failure to publish the complete report leads to a significant evidential gap. This lack of disclosure hinders both public understanding and the competent authority's ability to evaluate the potential social risks highlighted in the developer's own findings.

Residents are experiencing measurable stress, anxiety, and concern tied to the size and proximity of the proposal, as indicated by available summaries. These impacts arise

from direct community engagement and are not speculative. The absence of the full assessment restricts proper scrutiny of these findings, limiting their significance in the decision-making process.

Moreover, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. However, these critical impacts have not been adequately reflected in the main application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency further undermines the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of the social, economic, and health implications is vital, especially when the character and functioning of the community may be at stake. Without providing the complete dataset, the application fails to establish a comprehensive evidential basis necessary for weighing the benefits against potential harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and mitigate harm; however, the evidence currently available indicates pre-existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment, which constitutes a material omission and a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment involved. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a lack of development, and a pronounced sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence that would profoundly alter this character, resulting in a permanent and irreversible change to the landscape.

The application fails to accurately depict the magnitude of the anticipated visual changes. Given the scale and proximity of the turbines, they would overshadow views from residential properties, historic landmarks, and popular coastal areas. This would negatively affect visual amenity and diminish the essential qualities of naturalness and

remoteness. The assessment does not adequately convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the methods used to select and present visual viewpoints. There is evidence to suggest that the viewpoints chosen may not fully capture the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and high-value landscapes. This could lead to an underestimation of the visual impacts, thus compromising the reliability of the assessment.

Another major shortcoming is the lack of consideration for the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment considers these assets in isolation, failing to acknowledge their interdependence, which results in an incomplete understanding 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 goes beyond a mere visual impact, representing a more extensive cultural and spatial detriment that has not been sufficiently evaluated within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4 in terms of safeguarding natural environments and historic assets. The extent of change is incompatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant locations. Furthermore, the lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The size, height, and proximity of the turbines would create a dominant and unavoidable presence. Consequently, the resulting transformation is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These shortcomings hinder a dependable evaluation and strengthen the argument that the proposal is inconsistent with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks lacks the necessary detail to assess likely environmental impacts. The proposal entails significant seabed preparation and installation work in a high-energy Atlantic environment. However, it does not include fully developed Construction Environmental Management Plans or Pollution Prevention

Plans. Instead, the application depends on mitigation and contingency measures that would be created after consent, which obstructs any thorough assessment of their adequacy or effectiveness.

This reliance on unspecified future measures raises serious concerns due to the sensitive nature of the receiving environment. The West Lewis coastline hosts clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

There is also ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without solid modelling and clearly defined management strategies, it is impossible to establish the extent, duration, or ecological effects of these impacts. This uncertainty extends to possible effects on marine species and habitats previously recognised as sensitive in the wider assessment.

The lack of detailed emergency response procedures further complicates these issues. By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether suitable safeguards are in place to deal with pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, delaying critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and their mitigation must be evaluated prior to consent. When such information is absent, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

In summary, the absence of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts result in a materially deficient assessment. These issues hinder a thorough evaluation of construction and pollution risks and reinforce the view that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is significantly lacking and does not account for the full range of impacts associated with this integrated project. The offshore turbines and the associated onshore works are fundamentally interconnected, yet they are evaluated in isolation, leading to a disjointed analysis that fails to reveal the true magnitude of environmental and socio-economic repercussions.

Included in the onshore components are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through delicate landscapes. These activities necessitate

excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon reservoir and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By neglecting to address or postponing the evaluation of onshore impacts, the application inhibits a proper assessment of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be evaluated collectively; however, the disconnection between the offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities remain unclear.

There are notable risks posed to sensitive habitats, such as machair systems and peatland environments that are under policy protection. The application does not provide sufficient evidence that the impacts on these habitats have been comprehensively assessed or that suitable avoidance measures have been implemented. This results in a significant evidential gap concerning biodiversity protection.

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

From a policy standpoint, the failure to evaluate the project as an entirety and to demonstrate the safeguarding 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 weakens the application further.

In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this section of the application inadequate 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 crucial role in shaping environmental quality, cultural identity, and tourism value. The proposed introduction of permanent red aviation lighting that is visible over long distances would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The application does not assess the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors, representing a significant omission given the importance of dark skies to the area's identity and the growing sector of astro-tourism.

Equally concerning is the complete lack of evaluation regarding the impacts 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 result in disorientation and a heightened risk of collision. The absence of any lighting impact assessment or phototaxis study fails to evaluate how this aviation lighting could adversely affect these species or lead to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not account for nocturnal activity or the associated risks. Species like Kittiwakes, which may forage or migrate at night, also face vulnerability from artificial lighting, yet this risk has not been addressed. Without site-specific night-time data, a critical gap in understanding ecological impacts remains.

The failure to assess nocturnal impacts makes it impossible to determine whether protected species or designated sites could be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission contradicts the National Planning Framework 4, which aims to protect natural places and ensure environmental quality. Furthermore, it diminishes the overall assessment of landscape and seascape impacts, as night-time character is an essential component of the environment.

In conclusion, the absence of any assessment concerning dark skies and nocturnal wildlife leads to a significant 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 regarding tourism impacts is seriously lacking, as it does not address the economic and social repercussions for a vital sector of the Isle of Lewis economy. The local tourism industry relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and the feeling of seclusion. While the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contributions of this sector.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, generating more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience. Without this critical analysis, it remains uncertain whether the proposed development would provide a net economic advantage or hinder an established and expanding sector.

Additionally, the assessment overlooks the significance of environmental quality in bolstering tourism. It fails to recognise how unspoiled landscapes and dark skies

enhance visitor experiences, particularly in growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, leading to a substantial gap in understanding the effects on a crucial and evolving aspect of the local economy.

In an island community that has limited economic diversification, the neglect of tourism impact assessments carries broader implications for employment, local businesses, and community sustainability. The absence of an adequate Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated as mandated by the Islands (Scotland) Act 2018.

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

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and consider the economic dependencies of the island culminates in a significant evidential gap. This deficiency hampers a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal 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.

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: 3B96A260

