

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development's location off the west side of the Isle of Lewis is significant, as the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of this proposal with statutory requirements, national policy, and sustainable development principles due to its scale, proximity, and design.

A review of the Environmental Impact Assessment Report reveals that the application lacks an adequate evidential basis for a lawful determination. Missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal hinder a comprehensive understanding of the likely significant effects. The use of a flexible design framework complicates this further, as the reliance on unspecified mitigation measures raises questions about their effectiveness. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are clear policy conflicts evident within the proposal, as it appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. These conflicts particularly relate to biodiversity, natural places, cultural heritage, and health and wellbeing, failing to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such inconsistencies directly affect the statutory tests required for consent, compromising the ability of the competent authority to assess the development's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which

lacks commitments to specific turbine dimensions, layouts, or configurations, generates substantial uncertainty and hinders the consistent application of a worst-case scenario. This issue undermines the integrity of the assessment and obscures the true extent of environmental effects from both the public and the competent authority.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have not been adequately defined. As such, consent is being sought with the expectation that any environmental harm will be addressed at a later stage. This approach obstructs meaningful evaluations of effectiveness and an assessment of residual impacts. The deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly identified prior to determination.

Significant evidential deficiencies are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This results in uncertainties about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot 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. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot determine the application based on the information that has been provided.

ASSESSMENT OF ALTERNATIVES

The application does not meet the necessary statutory requirements of the Environmental Impact Assessment regime, particularly regarding the assessment of alternatives. Instead of providing a structured and reasoned comparison of feasible alternatives based on environmental impacts, it offers a narrative account of the project's evolution. This method fails to show that less harmful options have been properly identified, assessed, and selected over more damaging alternatives.

Moreover, there is a lack of transparent and evidence-based comparisons of alternative

offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has adequately considered the option of 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 the shore plays in determining impact, the absence of such analysis inhibits any conclusion that the proposed siting is the least damaging choice.

The shortcomings also apply to the assessment of cable routing and landfall, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or mitigate 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 through design has not been implemented, relying instead on measures to mitigate impacts after the design stage.

As a consequence, the application fails to show 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, making it difficult for the competent authority to determine if less harmful and more suitable alternatives are available. Without a comprehensive assessment of alternatives, it cannot be determined that the proposal is sustainable or compliant with policy.

From a policy standpoint, this inadequacy undermines alignment with National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment represents a significant omission that contributes to the conclusion that the application has not been properly evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species associated with the proposed development is seriously flawed. It does not offer a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is known for its high sensitivity and biological activity, yet the baseline data is lacking. The methods employed do not adequately capture the presence, behaviour, or habitat use of species in the region. Consequently, the assessment fails to provide a sound basis for evaluating the potential impacts of the project.

There is a significant oversight concerning otters, which are classified as a European Protected Species. The application neglects to properly recognise and assess their active use of coastal regions for foraging and movement. The failure to consider their core foraging range and behaviour means that the potential impacts of construction-related disturbances, noise, and increased activity have not been sufficiently evaluated. This gap undermines any conclusions about the absence of significant effects on this species.

The assessment also falls short in evaluating basking sharks. The reliance on aerial

surveys introduces a considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations that show frequent use of these waters. The omission of such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings imply that any conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and the National Planning Framework 4. Protected species have not been appropriately identified or assessed. The uncertainty introduced by these deficiencies prevents the conclusion of no adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, granting consent would not be lawful.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings hinder a thorough evaluation of impacts on marine ecology and protected species, indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant flaws, revealing substantial gaps in evidence and inconsistencies that challenge its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately prove that these species will not be negatively impacted. It is situated in crucial foraging areas and migratory routes, yet the assessment inadequately considers the risks of displacement, collision, or habitat loss.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, treating the West Lewis coastline merely as a collection of isolated, static assets rather than recognising it as a vibrant cultural landscape where environment, language, tradition, and community intertwine. This reductive approach overlooks the ongoing social, cultural, and spiritual roles that these heritage elements play within the community.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, yet the assessment characterises them as static features, ignoring their continued use and the implications of development on their context. This mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the community's deep-rooted relationship with the coastal environment. These aspects are essential to the area's identity, yet they are entirely omitted from the evaluation, representing a significant gap. Without recognising these factors, the true cultural impact of the development remains unclear.

There are additional concerns regarding community rights and the lack of engagement. The Gaelic-speaking population, recognised as possessing a distinct cultural identity akin to that of an Indigenous People, has not been involved in a process of Free, Prior

and Informed Consent. This absence of genuine participation undermines the legitimacy of the assessment and fails to uphold established principles of inclusion in decisions affecting cultural and environmental matters.

A significant procedural oversight is the failure to conduct a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination legally deficient.

From a policy standpoint, these shortcomings position the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with living cultural practices, clearly diverges from established policy requirements.

Overall, the combined failure to evaluate living heritage, intangible cultural value, community rights, and statutory requirements creates a significant evidential gap. The cultural impacts of the development have not been appropriately assessed, and the application fails to establish a solid foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment is a significant evidential gap that hinders both public understanding and the ability of the competent authority to evaluate the potential social risks associated with the proposal. While the developer did commission this assessment, which included focus groups with local residents, the lack of transparency surrounding its findings raises serious concerns.

Available summaries highlight that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are based on direct engagement and are not speculative. However, without access to the complete assessment, there is an impediment to properly scrutinising the findings and understanding their significance within the context of decision-making.

Moreover, there is evidence suggesting that the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” noted in the developer’s own findings. Yet, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs linked to the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning are at stake. The absence of the full dataset means that the application

does not provide a complete evidential basis for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. It is essential for development to support positive health outcomes and avoid harm, yet the evidence available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, compliance with this policy remains unproven.

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

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This situation hampers 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 significantly lacking and does not capture the extent of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and maintains an undeveloped character, providing a strong sense of remoteness. Introducing large-scale turbines near the shoreline would establish a continuous and prominent industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

The application inadequately addresses the extent of the visual change. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would impact visual amenity directly and diminish the qualities of naturalness and remoteness. The assessment fails to adequately reflect this impact or its importance in the context of such a sensitive landscape.

Concerns exist regarding how visual viewpoints were selected and presented. It appears that the chosen viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the possibility that the true extent of visual impact has been underestimated, which weakens the reliability of the assessment.

Another key shortcoming is the failure to evaluate the interconnected nature of 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 treats these as separate entities instead of recognising their interdependence, resulting in an inadequate

assessment of 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 a visual impact as well as a broader cultural and spatial harm that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which concerns the protection of natural areas and historical assets. The extent of the proposed changes is not compatible with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further questions any assertion of policy compliance.

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

In conclusion, the assessment does not accurately portray the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal conflicts with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The current proposal is deficient in its assessment of construction and pollution risks, lacking the necessary detail to adequately evaluate the likely environmental effects. Notably, the application involves 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, it relies on mitigation and contingency measures that are to be formulated post-consent, thereby hindering any meaningful assessment of their potential adequacy or effectiveness.

The reliance on undefined measures for future implementation is particularly troubling due to the sensitivity of the surrounding environment. The West Lewis coastline is characterised by clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. Although the application recognises risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient detail regarding the preventative, control, or monitoring measures that would be employed.

Furthermore, there is significant uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installations. The absence of robust modelling and clearly articulated management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these

potential impacts. This uncertainty also applies to the possible effects on marine species and habitats that have already been identified as sensitive in the broader assessment context.

Additionally, the lack of detailed emergency response procedures exacerbates these issues. By postponing the establishment of contingency planning until after consent is granted, the application obstructs the evaluation of whether adequate safeguards are in place to respond to any pollution incidents. This introduces procedural risks and compromises the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation measures be evaluated prior to granting consent, and the absence of such information impedes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential environmental impacts renders the assessment materially deficient. These shortcomings prevent a thorough evaluation of construction and pollution risks and strongly suggest that the application remains incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the application presents an insufficient assessment of fisheries and marine life, failing to provide a robust evaluation of ecological or socio-economic impacts. A significant concern is the assumption that fishing activity can be displaced without any consequence. The application lacks evidence to support the availability, accessibility, or capacity of alternative fishing grounds to sustain additional pressure, which is crucial since displacement could lead to overfishing in other areas and potentially result in broader economic repercussions for the local fleet. The absence of a clear and evidence-based assessment means that the effects on fisheries and livelihoods remain inadequately understood.

Furthermore, the proposal poses considerable risks to marine species, especially through the underwater noise generated during construction. The use of high-energy hammer piling over an extended duration is predicted to cause disturbances across large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns; however, the application downplays the significance of these effects and does so without providing sufficient supporting evidence.

There is a notable inconsistency within the application regarding the need for licences to permit harm to European Protected Species, which is acknowledged while

simultaneously describing the impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly in situations where harm is expected to a degree that necessitates legal authorisation.

The assessment also fails to address cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is necessary to determine the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed assessment of the onshore infrastructure is fundamentally incomplete and neglects to address the full extent of impacts associated with this integrated project. The offshore turbines and onshore works are closely interconnected, yet they are evaluated separately, leading to a disjointed approach that conceals the overall environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access routes through sensitive landscapes. These activities involve excavation through deep peat areas, particularly in Barvas Moor, which is an important carbon store and ecologically delicate habitat. The application falls short in delivering a thorough assessment of these impacts, thereby hindering a complete understanding of the project's environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively; however, the division between offshore and onshore components prevents a comprehensive understanding of their combined impacts on peatlands, habitats, and communities.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected 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. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise relating to carbon balance. Disturbing peatland releases stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or demonstrate that the overall carbon balance remains advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is no evidence provided that the required consents or processes have been initiated, which casts doubt on the project's feasibility and legal compliance.

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

In summary, the disconnection of project components, the lack of comprehensive assessment, and insufficient evidence concerning environmental and land use impacts render this segment of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment is deficient as it lacks consideration of dark skies and nocturnal wildlife, which are crucial elements of the West Lewis coastline's environmental quality and cultural identity. The area's exceptionally dark skies contribute significantly to its tourism value, yet the proposal introduces permanent red aviation lighting that creates an intrusive "wall of light" across the western horizon, fundamentally changing the night-time environment.

Additionally, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This oversight is particularly concerning given the rising significance of dark skies in promoting emerging tourism sectors like astro-tourism. The lack of a comprehensive assessment regarding these aspects represents a significant gap in the landscape and environmental evaluation.

Moreover, there is an absence of analysis regarding the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and increased risks of collision. The proposal does not encompass any impact assessment related to lighting or phototaxis studies, leaving an unaddressed question regarding how such aviation lighting may endanger these species or contribute to their mortality.

The reliance on daytime survey data in the ornithological assessment further exacerbates the issue, as it overlooks nocturnal activities and associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting, but this risk has not been evaluated. The lack of site-specific night-time data creates a critical shortfall in comprehending the ecological impacts involved.

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

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, they undermine the overall assessment of landscape and seascape impacts, given that night-time character is an integral aspect of the environment.

In summary, the failure to assess 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 assessment of tourism impacts lacks essential evaluation, overlooking the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the area's unspoilt landscapes, wild coastline, dark skies, and overall sense of remoteness. Although the application states that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure might alter visitor numbers, behaviour, or their overall economic contribution.

Since 2017, tourism has seen notable growth, rising from £65 million to over £81.5 million and supporting more than 1,000 jobs while constituting up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and the subsequent loss of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the assessment neglects to consider the significance of environmental quality in attracting tourists, including the role of unspoiled landscapes and dark skies in enhancing visitor experiences. This is particularly relevant for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this oversight, creating a significant gap in understanding the effects on a recognised and developing facet of the local economy.

Given the context of an island community with limited economic diversification, the neglect to evaluate tourism impacts carries broader implications for employment opportunities, local businesses, and community sustainability. The absence of a proper Island Communities Impact Assessment means these economic vulnerabilities have not been examined as stipulated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not adequately illustrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to demonstrate net benefit. It also stands in conflict with strategic objectives that prioritise tourism as a growth sector, lacking sufficient evidence to enable the competent authority to assess the economic ramifications of the proposal.

In summary, the cumulative failure to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and acknowledge the island's economic reliance culminates in a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails fundamentally to meet the criteria for sustainable development as required by statutory obligations, national policies, and evidential standards. This application reiterates the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, specifically regarding the unacceptable level of industrialisation. It is presented under a more robust policy framework that emphasises the importance of biodiversity, peatland conservation, landscape integrity, and the wellbeing of the community.

A reliable and comprehensive evidential basis for the determination is not provided within the application. Significant deficiencies exist in baseline data, including the continued use of an unspecified design envelope and an overreliance on unspecified mitigation measures. Furthermore, crucial impact pathways are omitted, such as those concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is inadequate, failing to allow for a complete understanding of likely significant effects or residual impacts.

There are also significant procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a substantial omission. These issues inhibit the competent authority from evaluating effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is inconsistent with National Planning Framework 4. It does not demonstrate the protection of biodiversity, natural environments, and cultural heritage.

Furthermore, it fails to provide evidence that health and wellbeing impacts are acceptable and lacks modelling of tourism impacts, which undermines claims of a net economic benefit. The cumulative effects of both offshore and onshore components have not been adequately assessed, thereby obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also internally inconsistent in certain aspects. The evidential requirement to dismiss adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

The proposal is set to induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, along with impacts on tourism, signify permanent consequences that cannot be mitigated to an acceptable degree.

Overall, the application is both procedurally and substantively unfit for determination. The extensive information gaps, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is obliged either to refuse consent on these bases or to invoke appropriate regulatory measures 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.

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: 032B1168

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Dear Sir/Madam

This representation 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 an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of the potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There are also evident and substantial conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests needed for consent and weaken the capacity of the competent authority to determine the proposal's acceptability in policy terms.

Moreover, the scale of the project is unprecedented for this area, with large turbines situated in close proximity to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and overall environmental consequences. When considered together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and pronounced policy non-compliance highlight that the application is incomplete and cannot support a lawful determination. Therefore, under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, or trustworthy account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, generates considerable uncertainty. This uncertainty compromises the assessment's integrity and obscures the actual impacts that the development may produce, thereby preventing both the public and the competent authority from grasping the true extent of environmental effects.

The application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is sought under the premise that any environmental harm will be remedied later, obstructing any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of crucial information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly identified prior to determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly where conclusions suggest negligible or non-significant effects without robust 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.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application lacks a structured, evidence-based assessment of alternatives that complies with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable alternatives considering environmental effects, it merely recounts the evolution of the project. This narrative

approach does not prove that the developer has adequately identified, assessed, and chosen less harmful options over more damaging ones.

Furthermore, there is a complete absence of transparent comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the failure to consider the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished, raises concerns. The West Lewis coastline is notably sensitive, and the critical nature of proximity to shore in evaluating impact means that without this analysis, it is impossible to conclude that the proposed site is indeed the least damaging choice.

The inadequacies extend to the evaluation of cable routing and landfall, where the evidence is insufficient to show that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis signify that the application has not employed mitigation by design, opting instead for reliance on post-design mitigation measures.

Consequently, the application does not adequately demonstrate 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 ascertain whether more appropriate and less harmful alternatives are available. Without a comprehensive alternatives assessment, it cannot be affirmed that the proposal is sustainable or complies with relevant policies.

From a policy viewpoint, these deficiencies compromise adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community well-being. The omission of a structured and comparative assessment is a significant shortcoming that contributes to the conclusion that the application has not been thoroughly evaluated and cannot be legally approved.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development presents significant concerns regarding marine ecology and the assessment of protected species, which is materially deficient. The West Lewis coastal environment is a highly sensitive and biologically active marine system. However, the existing baseline data is incomplete, and the methodologies employed do not adequately capture species presence, behaviour, and habitat use. This inadequacy leads to a lack of sound evidential basis for evaluating potential impacts.

Among the key issues is the failure to recognise and properly assess otters, a European Protected Species, and their active use of coastal areas for foraging and movement. The application does not take into account their core foraging range and behavioural patterns, which means the assessment does not adequately consider the potential effects of construction disturbance, noise, and increased activity. Consequently, this undermines any conclusions drawn regarding the absence of significant effects on this

species.

Furthermore, the assessment of basking sharks exhibits similar deficiencies. The reliance on aerial surveys introduces significant detection bias, particularly under Atlantic conditions, which is likely to underestimate their presence. This is particularly concerning when compared to established land-based observations that suggest frequent use of these waters. The failure to incorporate or give proper consideration to such data contributes to an incomplete baseline, further weakening the reliability of the conclusions presented.

The methodological limitations in the assessment result in conclusions of negligible or non-significant effects being based on assumptions instead of robust evidence. Additionally, the absence of sufficient baseline data hinders meaningful evaluations of cumulative and indirect impacts, which include seasonal variation and broader ecosystem interactions. This introduces uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements outlined in the Environmental Impact Assessment regime and National Planning Framework 4. Protected species have not been properly identified or assessed, and the level of uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of 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 obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, containing significant gaps in evidence and inconsistencies that undermine its conclusions. This raises serious concerns, particularly given that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. The application fails to meet the necessary evidential standard to demonstrate that these species will not be adversely affected. It is located within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate the risks associated with displacement, collision, or habitat loss.

Moreover, a critical contradiction is present within the application itself. The developer asserts that there will be no significant adverse effects, while also pursuing a Habitats Regulations derogation case, which is only applicable when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and highlights that the conclusions drawn are not substantiated by the evidence provided. Insufficient evidence is presented regarding the impact on seabirds associated with

protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches injects uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. There is a strong likelihood that the methodologies employed underestimate mortality, especially given that baseline data is lacking and behavioural responses remain poorly understood.

The proposed siting of turbines within a known migratory corridor introduces an additional risk, creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The long-term consequences of sustained mortality in this corridor, as well as the potential effects on species with small global populations, are not adequately assessed in the application.

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 combination of contradictory conclusions, data deficiencies, and limitations in the modelling means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and precludes a lawful conclusion in support of consent. The deficiencies identified also represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal 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 contribute to the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A major shortcoming lies in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice, yet the assessment reduces them to static features, neglecting their continued use, importance, and the influence of development on their surroundings. This mischaracterisation leads to an incomplete assessment of cultural effects and overlooks their vital role in community life.

Additionally, the application does not adequately address intangible cultural heritage, including the Gaelic language, traditions, and the community's enduring relationship

with the coastal environment. These components are crucial to the area's identity but are entirely overlooked in the assessment, representing a significant gap. Without recognising these aspects, the true cultural impact of the development remains obscured.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment significantly undermines the evaluation of social impacts, health, and wellbeing associated with the proposal. Although the developer engaged with local residents through focus groups, the complete report remains unpublished. This evidential gap impedes both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer's own research.

Available summaries reveal that residents are already facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts are based on direct engagement rather than speculation. Nonetheless, the absence of the full assessment restricts proper scrutiny of the findings and hinders the determination of their significance in the decision-making process.

Moreover, there are indications that the proposal is viewed as a direct threat to

community identity and cohesion, with references to “cultural loss” appearing in the developer’s findings. However, these impacts have not been adequately reflected in the main application or assigned appropriate weight. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This situation adversely affects the Environmental Impact Assessment process, as 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 lacks a solid evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. It is imperative that developments promote positive health outcomes and mitigate harm; however, the evidence presented indicates existing adverse effects that remain inadequately disclosed. Without access to the complete assessment, demonstrating compliance with this policy becomes impossible.

The procedural implications of this situation are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment, marking a material omission within the application that fails to meet the evidential requirements of the Environmental Impact Assessment regime.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of current adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs 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, undeveloped nature, and profound sense of remoteness. The proposed introduction of large-scale turbines in proximity to the shoreline would create a continuous industrial presence that fundamentally alters this character, resulting in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, failing to reflect the scale of change or the sensitivity of the environment adequately.

The application does not sufficiently represent the magnitude of the visual change that would occur. Given the scale and proximity of the turbines, they 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. This significant level of impact has not been properly conveyed, especially in the context of such a sensitive landscape.

Moreover, there are serious concerns regarding the methodology used for 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 raises the risk that the actual visual impact has been understated, which undermines the reliability of the assessment.

An additional deficiency in the assessment is its failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting, visually and spatially linked to the Atlantic horizon. Instead of acknowledging their interdependence, the assessment treats these heritage assets as isolated, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are experienced and severing their connection to the natural horizon. This impact is not merely visual; it represents a broader cultural and spatial harm that has not been adequately assessed. From a policy standpoint, the proposal contradicts National Planning Framework 4 in terms of protecting natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertion of policy compliance.

Lastly, it is clear that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. This change is fundamental and permanent, incapable of reduction to an acceptable level through mitigation. Collectively, these deficiencies in the assessment prevent a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents a materially deficient assessment of construction and pollution risks, failing to provide the necessary detail to evaluate likely environmental effects. Despite the proposal involving significant seabed preparation and installation works in a high-energy Atlantic environment, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be developed post-consent, thereby hindering a meaningful assessment of their adequacy or effectiveness.

Particularly alarming is this reliance on undefined future measures, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail regarding the

prevention, control, or monitoring of these risks.

There is considerable uncertainty surrounding 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 remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application undermines the evaluation of whether suitable safeguards are established to address pollution events. This introduces procedural risk and compromises the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures are evaluated prior to consent, and the absence of such information renders a lawful determination unattainable. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the deficiencies related to the undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively indicate that the assessment is 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 waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry, yet the application does not adequately demonstrate how these vital uses and habitats will be protected from significant disruption. The assessment of fisheries and marine life is inadequate and fails to provide a thorough evaluation of the ecological and socio-economic impacts involved.

A critical issue arises from the assumption that fishing activity can simply be displaced without consequence. The application lacks evidence to support the availability and accessibility of alternative fishing grounds, as well as their ability to handle increased pressure. This absence of information is particularly concerning, as it raises the risk of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain poorly understood.

Moreover, the proposal poses significant risks to marine species, notably through underwater noise generated during construction. The use of high-energy hammer piling for extended periods is expected to disturb marine life across large distances, notably

affecting species such as dolphins. The anticipated disruption to a substantial portion of the local bottlenose dolphin population presents serious concerns, yet the application downplays these effects, lacking adequate supporting evidence.

Inconsistencies within the application further undermine its credibility. While it acknowledges the need for licences to permit harm to European Protected Species, it simultaneously describes the impacts as negligible. This contradiction raises doubts about compliance with the Habitats Regulations, particularly given the anticipated harm that would necessitate legal authorisation.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to show that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thus preventing any determination that the proposal constitutes sustainable development.

Collectively, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and unreliable. These significant deficiencies hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of the onshore infrastructure, which is crucial as it is part of a single integrated project along with the offshore turbines. The distinct separation in the assessment of these components leads to a fragmented understanding of the environmental and socio-economic impacts, obscuring the overall scale of the project's footprint.

Onshore elements involve significant undertakings, including cabling across protected moorland and the construction of a substation near Stornoway, along with access infrastructure that traverses sensitive landscapes. Excavation activities in deep peat areas, notably within Barvas Moor, pose serious risks, as this location is a vital carbon store and ecologically sensitive habitat. The assessment does not adequately cover these impacts, which hampers a full evaluation of the environmental consequences of the project.

By excluding or delaying the assessment of onshore impacts, the application fails to allow for a thorough understanding of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project be considered in conjunction; however, the separation of offshore and onshore assessments results in a

lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal raises substantial concerns about the integrity of sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application does not convincingly demonstrate that impacts on these ecosystems have been thoroughly evaluated or that effective avoidance measures have been put in place, creating a significant evidential gap related to biodiversity protection.

There are also pressing concerns regarding carbon balance. Disturbance to peatland can release stored carbon, potentially resulting in a carbon debt that is at odds with the intentions behind renewable energy development. The application inadequately addresses this matter or provides assurance 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 of initiation of the necessary consents or processes, raising doubts about both the feasibility and lawful implementation of the proposal.

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

In summary, the separation of project components, lack of thorough assessment, and insufficient 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 West Lewis coastline is known for its exceptionally dark skies, which are integral to the region's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible across long distances, resulting in a continuous and intrusive effect on the western horizon, fundamentally altering the night-time environment.

The Environmental Impact Assessment fails to evaluate the consequences of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly significant due to the importance of dark skies to the area's identity and the growing tourism sector, including astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, there is no analysis of the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel

are known to be highly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not include any impact assessment regarding this lighting or a phototaxis study, thus failing to evaluate the potential effects on these species or the risk of increased mortality.

Additionally, the reliance on daytime survey data in the ornithological assessment fails to capture the nocturnal activities or associated risks. Species like Kittiwakes, which might forage or migrate during the night, are also vulnerable to disorientation from artificial lighting, yet this risk has not been evaluated. The absence of specific night-time data creates a critical gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it remains uncertain whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt is not achieved, which engages the precautionary principle and obstructs lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 regarding the protection of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider evaluation of landscape and seascape impacts, as the character of night-time settings is a fundamental component of the environment.

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having increased 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 lacks a meaningful evaluation of how the proposed large-scale offshore infrastructure could impact this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's natural scenery, it fails to provide a quantified analysis of how this development may alter visitor numbers, behaviour, or overall economic contributions.

The significance of environmental quality in tourism cannot be overlooked. The dependence on unspoiled landscapes and dark skies is crucial for visitor experience, especially for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment is particularly troubling, creating a considerable gap in understanding the effects on a sector that is not only recognised but also growing within the local economy.

In an island community that faces challenges related to economic diversification, the neglect to assess tourism impacts carries serious implications for local employment,

businesses, and overall community sustainability. The lack of an 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 does not meet the requirements outlined in National Planning Framework 4, particularly concerning economic impact and the demonstration of net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal adequately.

Overall, the failure to quantify the impacts on tourism, evaluate the environmental factors that influence visitor behaviour, and recognise the island's economic dependence on this sector results in a significant evidential gap. This omission undermines the possibility of 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 signifies a significant shortfall in meeting the standards of sustainable development when evaluated against statutory obligations, national policy, and required evidence. This application reiterates the fundamental issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, particularly regarding the unacceptable level of industrialisation. Now, it is introduced under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and the wellbeing of communities.

There are critical deficiencies in the evidential foundation provided for the determination of the application. Key baseline data is missing, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Additionally, the application neglects crucial impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment breaches the statutory requirements set forth by the Islands (Scotland) Act 2018. Furthermore, the incomplete Social Impact Assessment represents a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, rendering the application unsuitable for determination.

The proposal stands in stark contradiction to the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural areas, and cultural heritage. There is insufficient evidence to confirm that impacts on health and wellbeing are acceptable, nor can it substantiate a net economic benefit, largely due to the absence of tourism impact analysis. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, masking

potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks remain considerable. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The required evidential threshold needed to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful determination of acceptable impacts.

This proposal would bring about 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 potential repercussions for tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unsuitable for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental concerns, inhibit a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to require the submission of the outstanding information.

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

Additional Comments

I have lived here all my life and object to this do not want the damage this will cause to our environment and the impact on the people of this beautiful island.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: CBDD5929

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regulations. The objection arises from an analysis of the Environmental Impact Assessment Report and accompanying documentation, highlighting several significant deficiencies related to planning, environmental considerations, cultural aspects, and procedural issues. Situated off the west coast of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns have been raised regarding the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles, particularly given its scale, proximity to the shore, and design.

The application lacks a solid evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many key aspects of the proposal are left undefined. The application's flexible design framework inhibits a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed view of the potential environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects are not backed by adequate evidence.

Policy conflicts are evident and substantial. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately demonstrate that the national requirements for protecting biodiversity, climate interests, and environmental integrity can be satisfied. These discrepancies directly impact the statutory tests necessary for consent and hinder the competent authority's ability to deem the development acceptable under policy terms.

The unprecedented scale of this proposal raises additional issues, as large turbines are planned to be positioned in close proximity to the shoreline, introducing serious concerns regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks commitments to specific turbine dimensions, layouts, or configurations, generates substantial uncertainty and hinders the consistent application of a worst-case scenario. This issue undermines the integrity of the assessment and obscures the true extent of environmental effects from both the public and the competent authority.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have not been adequately defined. As such, consent is being sought with the expectation that any environmental harm will be addressed at a later stage. This approach obstructs meaningful evaluations of effectiveness and an assessment of residual impacts. The deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly identified prior to determination.

Significant evidential deficiencies are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This results in uncertainties about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot 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. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot determine the application based on the information that has been provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment submitted concerning marine ecology and protected species is fundamentally inadequate and fails to furnish a complete and trustworthy understanding of the ecological receptors present within the West Lewis coastal environment. This area is characterised as a highly sensitive and biologically active marine ecosystem, yet the existing baseline data is insufficient, and the methodologies

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

One significant shortcoming pertains to otters, which are classified as a European Protected Species. The application does not sufficiently acknowledge or assess their active utilisation of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that the potential consequences of construction disturbance, noise, and increased activity have not been thoroughly evaluated. This deficiency undermines any assertions regarding the absence of significant effects on this species.

The assessment of basking sharks also exhibits serious shortcomings, as reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of the species' presence, especially when compared to established land-based observations that indicate regular use of these waters. The failure to include or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological flaws indicate that conclusions regarding negligible or non-significant effects are predicated on assumptions rather than on robust evidence. Furthermore, the lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, which encompasses seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the actual scale of risk posed to marine species and habitats.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These inadequacies obstruct a thorough evaluation of the impacts on marine ecology and protected species and lead to the overarching conclusion that the application lacks an adequate evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment related to the proposed development is profoundly inadequate, exhibiting numerous internal inconsistencies and significant evidence gaps that undermine its findings. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to convincingly demonstrate that these species

will not suffer adverse effects. This development is situated in key foraging areas and migratory paths, yet the assessment does not thoroughly explore the implications of displacement, collision risk, or habitat loss.

A striking contradiction arises within the application itself, where the developer claims that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. Such inconsistencies cast doubt on the reliability of the assessment, suggesting that the conclusions drawn are not supported by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The critical importance of these feeding grounds has not been fully recognised, and the reliance on modelling techniques introduces further uncertainty, particularly concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially when baseline data is incomplete and the behavioural responses of the species are not well understood.

The placement of turbines within a recognised migratory corridor presents an additional, significant risk, as it effectively creates a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of sustained mortality in this corridor or the potential impact on species with relatively small global populations.

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

The identified deficiencies further indicate a failure to comply with the National Planning Framework 4, specifically 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 contradiction with national policy.

Collectively, these issues render the assessment unreliable, characterised by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings obstruct a thorough evaluation of the impacts and lead to the conclusion that the application does not fulfil the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is significantly deficient and overlooks the West Lewis coastline's status as a dynamic cultural landscape, where the environment, language, tradition, and community are interconnected. The application employs a simplistic

approach that treats heritage as discrete, unchanging assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A major shortcoming is evident in the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice; however, the assessment categorises them merely as static elements, failing to acknowledge their continued use and significance, as well as the potential impact of development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their vital role in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks the necessary transparency and completeness in its 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 has not been made available. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to fully assess the social risks that have been identified through the developer's research.

Residents have reported experiencing stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement with the community and are not mere speculation. The withholding of the full assessment limits scrutiny of these findings and impairs the assessment of their significance in the decision-making process.

Additionally, there are indications that the proposal is seen as a threat to community identity and cohesion, with references to "cultural loss" appearing in the developer's own findings. Despite this recognition, these impacts have not been adequately incorporated into the main application or considered with the necessary seriousness. The lack of access to the full Social Impact Assessment obscures the actual human and social costs associated with the development.

This lack of transparency also compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when they may affect community character and functionality. The absence of the complete dataset means the application does not offer a full evidential basis for evaluating the balance between benefits and detriments.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid harm; however, the evidence currently available suggests existing negative impacts that remain undisclosed. Without the complete assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications are serious. The competent authority is unable to carry out a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material shortcoming in the application and fails to fulfil the evidential requirements of the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, along with the evidence of current adverse effects, renders the assessment inadequate and untrustworthy. This situation hampers a lawful determination and supports the view that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly lacking, failing to capture the scale of change and the sensitivity of the environment. The coastline of West Lewis is characterised by its unspoilt Atlantic horizon and a

pronounced sense of remoteness. The proposed large-scale turbines, situated in close proximity to the shoreline, would introduce a continuous industrial presence, fundamentally changing this character and resulting in a permanent alteration of the landscape.

The application inadequately portrays the extent of this visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within such a sensitive landscape.

Concerns are raised regarding the methodology used in selecting and presenting visual viewpoints. It appears that these viewpoints do not adequately reflect the most sensitive receptors or the worst-case scenarios, especially regarding important cultural heritage sites and high-value landscapes. This possibility raises doubts about the accuracy of the visual impact assessment, suggesting it may have been understated.

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, exist within a broader landscape that is visually and spatially linked to the Atlantic horizon. The failure to acknowledge their interdependence leads to an incomplete understanding of the impacts on their setting and cultural significance.

The anticipated industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and affecting their relationship with the natural horizon. This represents not just a visual impact, but a deeper cultural and spatial harm that remains unaddressed in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the protection of natural places and historic assets. The magnitude of change proposed is not aligned with the requirements to preserve landscape character, visual amenity, and the context of culturally significant sites. Moreover, the lack of a thorough worst-case scenario assessment further weakens any assertions of compliance with policy.

It is evident that the impacts highlighted cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines would ensure that their presence remains dominant and unavoidable. The resulting transformation is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks a thorough assessment of construction and pollution risks, leaving it insufficient for determining the likely environmental effects. It involves significant seabed preparation and installation activities in a high-energy Atlantic setting, yet it does not present comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it suggests that mitigation and contingency measures will be established after consent is granted, obstructing any meaningful evaluation of their potential adequacy or effectiveness.

This uncertainty regarding future measures is particularly troubling, considering the sensitivity of the environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and pollution. Although the application notes risks such as sediment mobilization and the possibility of chemical or oil spills, it lacks sufficient detail on methods to prevent, control, or monitor these occurrences.

There is considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without thorough modelling and defined management strategies, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

The concerns are further exacerbated by the absence of detailed emergency response procedures. By postponing contingency planning until after consent, the application fails to allow for an evaluation of whether adequate safeguards will be in place to address pollution incidents. This situation introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the stipulations of the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies are evaluated prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, detailed management plans, and clarity on potential impacts contributes to a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the notion 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 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 evaluation regarding dark skies and nocturnal wildlife is a significant oversight in the Environmental Impact Assessment. The West Lewis coastline boasts exceptionally dark skies, which are integral to the area's environmental quality, cultural

identity, and tourism appeal. The introduction of permanent red aviation lighting, which will be visible over long distances, is set to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application does not consider the impact this lighting would have on visual amenity, landscape character, or the experience of both residents and visitors. This lack of assessment is particularly concerning, given the critical role that dark skies play in the area’s identity and in emerging sectors like astro-tourism. The failure to address these impacts results in a notable gap in the landscape and environmental evaluation.

Equally alarming is the neglect of potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which may cause disorientation and elevate the risk of collision. The application omits any lighting impact assessment or phototaxis study, failing to evaluate how aviation lighting could affect these species or increase mortality rates.

This issue is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which does not adequately reflect nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a substantial gap in comprehending ecological impacts.

Without a thorough assessment of nocturnal effects, it is impossible to ascertain whether protected species or designated sites might be negatively impacted. The required evidential standard to confidently exclude adverse effects cannot be achieved, invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also diminish the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a crucial element of the landscape.

In conclusion, the failure to assess dark skies and nocturnal wildlife represents a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

TOURISM

The application acknowledges that 86% of visitors to the Isle of Lewis are attracted by its scenery. However, it does not provide any quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism. This is particularly concerning given that tourism has

seen substantial 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.

Furthermore, the assessment overlooks the critical role of environmental quality in sustaining tourism, such as the significance of unspoiled landscapes and dark skies for visitor experiences. Emerging markets like nature-based tourism and astro-tourism rely heavily on these attributes. The failure to include a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on a recognised and expanding sector of the local economy.

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

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

Overall, the combination of not quantifying tourism impacts, neglecting environmental drivers of visitor behaviour, and disregarding the island's economic dependency leads to a significant evidential gap. This absence of thorough analysis hinders a robust evaluation of economic effects and suggests that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It echoes the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a central concern. The current application is submitted under a policy framework that ostensibly prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are critical gaps in the evidential basis required for decision-making, including incomplete baseline data and the use of an undefined design envelope. Additionally, there is an overreliance on unspecified mitigation measures, while key impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—have been overlooked. The Environmental Impact Assessment is therefore inadequate, failing to provide a full understanding of the potential significant effects or residual impacts.

Procedural shortcomings are also evident in this application. The lack of a compliant

Island Communities Impact Assessment breaches the statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These failures hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal is in direct conflict with National Planning Framework 4. It does not adequately demonstrate protection for biodiversity, natural places, and cultural heritage; it fails to show that health and wellbeing impacts are acceptable; and it lacks evidence of a net economic benefit, due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been properly evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The significant information deficiencies, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the necessary regulatory provisions to require the submission of the outstanding information.

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

Additional Comments

This windfarm proposal is absolutely, unbelievably short sighted. The future well being of those who live on the island should of a substantial priority. A whole culture will be affected.

The Western Isles needs to retain its uniqueness. They are an asset to Scotland and simply must remain so, as an encouragment to people to travel through Scotland, explore other regions and experience other islands as the journey to the Outer Hebrides.

Visitors are inspired to experience more of Scotland after travelling around Lewis and Harris and, as Donald Trump said, " (we) are hard core Scottish people."

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2F8E1311

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. This objection arises from a thorough review of the Environmental Impact Assessment Report and supporting documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. 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. Concerns have been raised regarding the proposal's compatibility with statutory requirements, national policy, and the principles of sustainable development, particularly given its scale, proximity to the shoreline, and design.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is found to be limited and inconsistent. Furthermore, key aspects of the proposal remain undefined. The application employs a flexible design framework, which obscures a clear understanding of potential significant effects. Additionally, the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The proposal presents clear and substantive conflicts with established policies. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests essential for consent and undermine the capability of the competent authority to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal raises considerable concerns regarding landscape capacity, visual dominance, and overall environmental impact due to the large turbines' proximity to the shoreline. Collectively, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential detail and fails to provide a comprehensive, transparent account of the likely environmental impacts of the proposal. The flexible Project Design Envelope approach, which does not commit to specific dimensions, layouts, or configurations of the turbines, introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario and undermines the assessment's integrity, preventing both the public and the relevant authorities from fully understanding the true environmental implications of the development.

Moreover, the application depends heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent based on the premise that environmental harm will be addressed at a later date, the application hinders any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contravenes the principles of the Environmental Impact Assessment regime, which mandates that significant effects and mitigations are clearly established before any decision is made.

There are also notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such deficiencies create uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are claimed without robust supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, particularly in relation to 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 combination of an undefined design envelope, the absence of specified mitigation measures, and the significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed determination based on the information provided.

ORNITHOLOGY AND SEABIRD IMPACTS

The west coast of the Isle of Lewis hosts internationally important seabird populations that are already in decline. However, the ornithological assessment associated with the application is materially flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. The assessment fails to demonstrate,

to the necessary evidential standard, that these species will not face adverse effects. Critical foraging areas and migratory pathways have not been robustly evaluated in terms of displacement, collision risk, or habitat loss, leaving key impacts unaddressed.

A fundamental contradiction is evident in the application, where the developer concludes that no significant adverse effects will occur while also advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious concerns regarding the reliability of the assessment and suggests that its conclusions are unsupported by the available evidence. The assessment does not sufficiently prove that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately acknowledged, and reliance on modelling approaches introduces uncertainty, particularly for species already in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional significant risk, effectively creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of sustained mortality within this corridor and the potential repercussions for species with relatively small global populations.

Regulatory compliance is also called into question, as the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion in favour of consent.

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 affected directly conflicts with national policy. Collectively, these issues render the assessment unreliable, highlighting internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings thwart a thorough evaluation of impacts and culminate in the conclusion that the application does not satisfy the statutory requirements needed 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 current assessment of health, wellbeing, and social impacts is significantly lacking in transparency, which raises serious concerns about its legality. While the developer has initiated a Social Impact Assessment that included focus groups with local residents, the absence of the full report creates a considerable evidential void. This lack of comprehensive information restricts both public understanding and the competent authority's ability to grasp the full extent of social risks identified by the

developer's research.

Residents have reported experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are founded on direct community engagement, thus are not merely speculative. However, the withholding of the complete assessment inhibits proper scrutiny of these findings and diminishes their relevance in the decision-making process.

Moreover, there is a prevailing sentiment that this proposal poses a threat to community identity and cohesion, with the developer acknowledging "cultural loss" in their findings. Unfortunately, such critical impacts have not been adequately reflected in the main application nor given the necessary consideration. The failure to disclose the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health consequences is vital for developments of this magnitude, especially when they can affect community character and functioning. Without the complete dataset, the application does not provide a robust evidential basis for weighing the potential benefits against the possible harms.

From a policy standpoint, the application does not appear to align with the requirements of National Planning Framework 4 concerning health and wellbeing. Developments should enhance positive health outcomes and mitigate harm, yet the existing evidence points to adverse effects that have not been transparently communicated. Without access to the full assessment, it is impossible to demonstrate compliance with this policy.

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 significant omission within the application fails to meet the evidential standards required by the Environmental Impact Assessment framework.

Collectively, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the evaluation incomplete and unreliable. This situation hampers a lawful determination and underscores that the application lacks sufficient information to be considered valid.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts associated with the proposed development is significantly lacking and does not sufficiently account for the degree of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, its undeveloped nature, and a pronounced sense of remoteness. The introduction of large-scale turbines situated

near the shoreline would lead to a continuous and overpowering industrial presence, fundamentally changing this character and resulting in a permanent and irreversible alteration of the landscape.

Furthermore, the application does not accurately depict the extent of this visual change. Given the scale and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of these impacts within the context of such a sensitive landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may fail to adequately represent the most sensitive receptors or extreme scenarios, particularly in connection with key cultural heritage sites and areas of high landscape value. This raises concerns that the magnitude of visual impact has been understated, thereby undermining the reliability of the assessment.

Another critical shortcoming is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integrated into a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and leading to an incomplete analysis of the impacts on their context and cultural significance.

The industrialisation of the seascape would sever these vital connections, changing the environment in which heritage assets are perceived and disrupting their relationship with the natural horizon. This presents not only a visual impact but also a deeper cultural and spatial damage that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4 regarding the preservation of natural areas and historic assets. The extent of change is incompatible with the requirements to protect landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case scenario assessment further undermines any assertions of policy compliance.

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

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and underscore the conclusion that the proposal is incompatible with the safeguarding of this landscape.

FISHERIES AND MARINE LIFE

The application raises significant concerns regarding the assessment of fisheries and marine life, which is inadequate and does not deliver a thorough evaluation of ecological or socio-economic impacts. The area off the West Lewis coast is home to a rich marine ecosystem and a thriving fishing industry. However, the proposal does not sufficiently demonstrate that these critical habitats and uses can be preserved or maintained without considerable disruption.

A notable issue is the presumption that fishing activities can be displaced without adverse effects. The application lacks any evidence indicating the availability, accessibility, or capacity of alternative fishing grounds to accommodate additional pressure. This gap is critical, as such displacement could lead to overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Without a thorough and evidence-backed assessment, understanding the implications for fisheries and local livelihoods remains elusive.

Moreover, the proposed development poses considerable risks to marine species, especially due to the underwater noise produced during construction. The anticipated high-energy hammer piling over a prolonged duration is expected to create disturbances over extensive distances, impacting species such as dolphins. The predicted effects on a notable portion of the local bottlenose dolphin population raise significant issues, yet the application tends to underestimate these impacts without adequate supporting evidence.

Inconsistencies are evident within the application itself, where it acknowledges the necessity of licences to allow harm to European Protected Species, while simultaneously characterising these impacts as negligible. This contradiction undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, especially when harm is anticipated to a degree that mandates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a holistic evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

When viewed collectively, the deficiencies in the assessment regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the evaluation incomplete and unreliable. These shortcomings hinder a thorough assessment of the effects on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife represents a significant gap in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect along the western horizon, fundamentally changing the night-time environment.

There is no evaluation of the impact that this lighting may have on visual amenity, landscape character, or the experiences of residents and visitors. This oversight is particularly important as dark skies contribute to the area's identity and emerging tourism sectors such as astro-tourism. The omission of these impacts results in a noticeable gap in the overall assessment of landscape and environmental factors.

Equally concerning is the absence of any evaluation of the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, as phototaxis can lead to disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to consider how aviation lighting may affect these species or contribute to increased mortality rates.

Compounding this issue is the dependence on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or associated risks. Additionally, species like Kittiwakes, which may forage or migrate at night, are at risk of disorientation from artificial lighting, yet this risk remains unassessed. The lack of site-specific night-time data creates a critical deficiency in understanding ecological impacts.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 concerning the protection of natural places and environmental quality. This also undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having increased 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 lacks a meaningful evaluation of how the proposed large-scale offshore infrastructure could impact this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's natural scenery, it fails to provide a quantified analysis of how this development may alter visitor numbers, behaviour, or overall economic contributions.

The significance of environmental quality in tourism cannot be overlooked. The dependence on unspoiled landscapes and dark skies is crucial for visitor experience, especially for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment is particularly troubling, creating a considerable gap in understanding the effects on a sector that is not only recognised but also growing within the local economy.

In an island community that faces challenges related to economic diversification, the neglect to assess tourism impacts carries serious implications for local employment, businesses, and overall community sustainability. The lack of an 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 does not meet the requirements outlined in National Planning Framework 4, particularly concerning economic impact and the demonstration of net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal adequately.

Overall, the failure to quantify the impacts on tourism, evaluate the environmental factors that influence visitor behaviour, and recognise the island's economic dependence on this sector results in a significant evidential gap. This omission undermines the possibility of 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 does not meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. It presents issues similar to those that caused the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This new application is submitted under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet still fails to address these crucial aspects.

The application lacks a thorough and reliable basis for determination. There are significant gaps in the baseline data, and it continues to employ an undefined design envelope. Additionally, it relies on unspecified mitigation measures and overlooks key impact pathways related to nocturnal wildlife, comprehensive onshore infrastructure,

and tourism effects. Consequently, the Environmental Impact Assessment remains incomplete, hindering a full understanding of potential significant effects and residual impacts.

There are notable procedural shortcomings as well. The failure to provide a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, not disclosing the full Social Impact Assessment is a significant omission. These shortcomings inhibit the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage. Health and wellbeing impacts are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of offshore and onshore elements have not been properly evaluated, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and potentially significant environmental risks remain. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to prove that adverse effects are excluded beyond reasonable scientific doubt has not been reached, invoking the precautionary principle and making it impossible to legally conclude that impacts are acceptable.

The proposal would bring about considerable and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and have impacts on tourism, leading to permanent effects that cannot be mitigated to an acceptable level.

Overall, the application is unfit for determination both procedurally and substantively. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, makes it impossible to reach 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.

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: A0DC225F

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. The objection arises from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing notable deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns about the scale, proximity, and design of the project cast doubt on its adherence to statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation necessary for a lawful determination. It is evident that critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. Furthermore, the flexible design framework employed creates ambiguity regarding potential significant effects. The reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation falls short of providing a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There exist clear and substantial conflicts with policy. The proposal demonstrates inconsistencies with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that national obligations aimed at safeguarding biodiversity, climate interests, and environmental integrity can be fulfilled. Such conflicts directly challenge the statutory tests necessary for consent and compromise the ability of the competent authority to ascertain the development's acceptability from a policy standpoint.

The scale of this proposal is unprecedented for the area, with large turbines positioned dangerously close to the shoreline. This raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance highlights the application's incompleteness and its inability to facilitate a lawful determination. In light of these considerations, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a comprehensive and transparent examination of the likely environmental consequences of the proposed project. A significant concern is the reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and obstructs a reliable worst-case scenario assessment, undermining the evaluation's integrity. Consequently, the impacts outlined may not accurately represent the final development, leaving both the public and the competent authority without a clear understanding of the true environmental ramifications.

The application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Consent is being sought with the assumption that environmental harm will be addressed later, which hinders any effective evaluation of these measures' efficacy or the assessment of residual impacts. This approach, which defers critical information to post-consent phases, is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation strategies are clearly outlined before a determination is made.

Moreover, there are substantial evidential shortcomings, such as insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This creates uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust data to support such conclusions. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that fails to align with statutory requirements.

As a result, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, which is necessary to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in aspects relating to biodiversity protection and environmental integrity, as it has not been established 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 specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, thereby leaving the competent authority unable to make a well-informed decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment is significant, as it does not adhere to the statutory requirements of the Environmental Impact Assessment regime. The

application offers a narrative of the project's evolution rather than a structured, reasoned comparison of realistic alternatives based on their environmental effects. This method fails to show that less harmful options have been properly identified, assessed, and selected in favour of more damaging solutions.

The lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, and design configurations is particularly concerning. The application does not convincingly demonstrate that the developer has given serious consideration to locating turbines further offshore, where the visual, ecological, and coastal impacts would likely be less severe. The West Lewis coastline is sensitive, and the crucial role of proximity to shore in determining impact highlights the critical need for this analysis; without it, there is no basis for concluding that the proposed siting represents the least damaging option.

This issue extends to the cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been implemented, with an overreliance 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 failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. Without a comprehensive alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution. From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment represents a material omission that reinforces the conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents significant deficiencies in the assessment of marine ecology and protected species, failing to deliver a complete and reliable understanding of the ecological receptors within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the methodologies employed are inadequate, with incomplete baseline data that does not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment does not furnish a sound evidential basis for evaluating potential impacts.

One major shortcoming is the assessment of otters, a European Protected Species, where their active use of coastal areas for foraging and movement has not been properly recognised or evaluated. The omission of their core foraging range and behavioural patterns means that potential effects from construction disturbance,

noise, and increased activity have not been sufficiently assessed. This gap undermines the conclusions regarding the absence of significant effects on otters.

Further issues arise in the evaluation of basking sharks, which relies on aerial surveys that introduce considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or appropriately consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

These methodological flaws lead to outcomes of negligible or non-significant effects that are based more on assumptions than on robust evidence. Additionally, the lack of adequate baseline data hampers any meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk to marine species and habitats.

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

Collectively, the incomplete baseline data, flawed methodologies, and unsupported conclusions render the assessment unreliable. These deficiencies inhibit a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development includes the siting of turbines within key foraging areas and a recognized migratory corridor on the west coast of the Isle of Lewis, which supports internationally important seabird populations. These populations are already experiencing declines, yet the ornithological assessment provided fails to demonstrate adequately that they will not be adversely affected. The assessment lacks sufficient evidence regarding the impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The methodologies employed introduce significant uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline.

A fundamental contradiction arises within the application itself, as the developer claims there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, a process required when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that its conclusions are unsupported by the evidence presented. The siting of turbines within a primary flight path poses an additional significant risk, creating a

barrier for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed.

From a regulatory standpoint, the application does not meet the evidential threshold to conclude no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, obstructing any lawful conclusion in favour of consent. Moreover, the identified deficiencies indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and safeguarding natural assets. The proposal's inability to demonstrate that internationally important seabird populations will remain unaffected directly conflicts with national policy.

Overall, the assessment's internal inconsistencies, methodological flaws, and inadequate evidence render it unreliable. These shortcomings prevent a thorough evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A major shortcoming lies in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places for burial and spiritual practice, yet the assessment reduces them to static features, neglecting their continued use, importance, and the influence of development on their surroundings. This mischaracterisation leads to an incomplete assessment of cultural effects and overlooks their vital role in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The absence of the full Social Impact Assessment constitutes a significant procedural flaw, preventing the competent authority from conducting a thorough socio-economic and health evaluation. This lack of transparency leads to a material omission within the application, which does not meet the evidential standards required under the Environmental Impact Assessment regime.

Evidence suggests that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These findings, derived from direct engagement with local residents, provide crucial insight into existing adverse effects that must be considered. However, the failure to publish the full assessment hampers proper scrutiny and limits the ability to ascertain the significance of these impacts in the context of decision-making.

Furthermore, the developer's own findings indicate that the proposal is viewed as a threat to community identity and cohesion, citing "cultural loss" as a concern. Unfortunately, these impacts have not been adequately incorporated into the application or afforded the necessary weight. The withholding of the complete Social Impact Assessment obscures the actual human and social costs associated with the development.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm. The available evidence, which points to existing adverse effects, has not been fully disclosed, thereby preventing a demonstration of compliance with relevant policy.

The deficiency in the assessment of social impacts, health, and wellbeing leads to a materially deficient evaluation that lacks the transparency necessary for lawful consideration. A comprehensive understanding of social, economic, and health impacts is essential for developments of this magnitude, particularly when community character and functionality are at stake. Consequently, the application fails to provide a complete evidential basis for weighing benefits against harm. Taken together, the failure to disclose the full Social Impact Assessment, alongside existing evidence of adverse impacts, renders the assessment incomplete and unreliable, inhibiting a lawful determination and reinforcing the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

The application does not sufficiently convey the magnitude of the anticipated visual change. The size and proximity of the turbines are such that they would dominate the views from residential areas, historic sites, and popular coastal locations. This would negatively impact visual amenity and degrade the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within the context of a sensitive landscape.

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

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

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

application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The application for the proposed construction raises significant concerns due to its incomplete assessment of construction and pollution risks. Substantial seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be devised after consent, which hinders a thorough evaluation of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures, especially given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

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

Compounding these issues is the lack of detailed emergency response procedures, which raises additional concerns. By postponing contingency planning to a post-consent phase, the application obstructs the evaluation of whether appropriate safeguards are in place to address pollution incidents. This introduces procedural risks

and undermines the competent authority's ability to assess environmental protection measures at the critical determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to granting consent, and the absence of such crucial information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These failures impede a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is critically lacking, failing to account for the full scope of impacts stemming from this integrated project. The offshore turbines and onshore components are interconnected, yet their evaluation is conducted separately. This fragmented approach obscures the true extent of environmental and socio-economic consequences.

Included in the onshore elements are the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. Such works involve excavation in areas of deep peat, notably within Barvas Moor, which serves as a significant carbon store and an ecologically sensitive habitat. The current application does not offer a thorough assessment of these impacts, hindering a complete understanding of the project's environmental footprint.

Moreover, by omitting or postponing the assessment of onshore impacts, the application impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all aspects of a project be considered collectively, but the distinction between offshore and onshore elements means the combined effects on peatlands, habitats, and local communities are inadequately understood.

There are considerable risks to sensitive habitats, including machair systems and peatland environments, which are protected under policy. The application fails to demonstrate that the impacts on these habitats have been sufficiently evaluated or that appropriate avoidance measures have been considered. This results in a notable gap in the evidence concerning biodiversity protection.

Additionally, the proposed routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, raising

significant concerns about deliverability and legal compliance.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks an evaluation of dark skies and nocturnal wildlife, representing a significant oversight. The West Lewis coastline is renowned for its exceptionally dark skies, which play a vital role in enhancing environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting, which would be visible over long distances, is set to create an intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Moreover, the application fails to assess the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly crucial given the value of dark skies to the identity of the area and its emerging tourism sectors, such as astro-tourism. The lack of consideration for these impacts indicates a significant deficiency in the overall landscape and environmental assessment.

Equally concerning is the absence of an evaluation regarding the effects on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and an increased risk of collisions. The proposal does not include any form of lighting impact assessment or phototaxis study, thus neglecting to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This deficiency is further aggravated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and its associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The lack of site-specific night-time data creates a critical void in understanding ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific

doubt cannot be achieved, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the omission contravenes the National Planning Framework 4 regarding the safeguarding of natural environments and the maintenance of environmental quality. Furthermore, it undermines the wider analysis of landscape and seascape impacts, as the character of night-time is an integral component of the environment.

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

TOURISM

The application presents a significant shortfall in the assessment of tourism impacts, neglecting to examine the economic and social ramifications for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. Although the application states that 86% of visitors are attracted by scenery, it lacks a quantified evaluation of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and making up to 16% of the island's economy. However, the application does not examine how the potential industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or broader economic resilience. This absence of analysis precludes a determination of whether the development would provide a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment overlooks the significance of environmental quality in tourism, particularly the need for unspoiled landscapes and dark skies for an enhanced visitor experience. The lack of a Dark Skies Assessment exacerbates this oversight, resulting in a major gap in understanding the effects on a recognised and growing segment of the local economy, namely nature-based tourism and astro-tourism.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. It also contradicts strategic objectives identifying tourism as a priority

growth sector, lacking sufficient evidence for the competent authority to assess the economic consequences of the proposal.

In summary, the inadequacies in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and recognising the island's economic reliance result in a considerable evidential void. This gap hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and evidential benchmarks. This application mirrors the core issues that resulted in the denial of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Presenting this proposal under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, does not rectify its inherent flaws.

There is a lack of a complete and reliable evidential basis for determination in the application. Critical gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the omission of significant impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, further compromise the application. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects and residual impacts.

Procedural shortcomings are also evident. The failure to produce a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Moreover, the omission of the complete Social Impact Assessment represents a substantial gap in the information provided. These deficiencies prevent the competent authority from adequately assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal stands in direct opposition to the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural landscapes, and cultural heritage. Furthermore, it fails to show that the health and wellbeing impacts are acceptable and cannot substantiate a net economic benefit due to the lack of tourism impact modelling. Additionally, the cumulative impacts of both offshore and onshore components have not been sufficiently assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in several areas. The evidential

threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

When considered collectively, these procedural and substantive deficiencies render the application unfit for determination. The considerable information gaps, policy conflicts, and unresolved environmental risks prevent a lawful, evidence-based decision. Therefore, the competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to demand 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

Living between the island and my home in Strathpeffer, I strongly object to this project. It will destroy the scenery & wildlife. It will have a massive impact of tourism, night skies and northern lights. The island will not be the same. There is also the impact on local NHS services which do not have capacity to deal with the many workers this project will bring to the island. The sun sets in the west, those sunsets will never be the same if this goes 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: 2F685F04

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

Dear Sir/Madam

This document serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted pursuant to marine licensing and Environmental Impact Assessment regulations. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies across material planning, environmental, cultural, and procedural dimensions. The proposed development, situated off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a largely untouched environment, and a rich cultural identity. Concerns arise from the scale, proximity, and design of the project, which may not align with statutory requirements, national policy, and sustainable development principles.

The application does not furnish a sufficient evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Key elements of the proposal remain undefined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders an evaluation of their efficacy impossible. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust supporting evidence.

Substantial policy conflicts are evident, as the proposal is seemingly at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency particularly pertains to biodiversity, natural environments, cultural heritage, and public health and wellbeing. The application does not satisfactorily demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent and hinder the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal, featuring large turbines located close to the shoreline, raises significant issues related to landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation strategies, evidential deficiencies, and clear non-compliance with policy demonstrates that the application is incomplete and cannot substantiate a lawful determination. In light of these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty and compromises the integrity of the Environmental Impact Assessment Report. This approach undermines the ability to apply a consistent worst-case scenario, leading to potential discrepancies between the presented impacts and those of the actual development. As a result, both the public and the competent authority are unable to comprehend the true extent of the environmental effects.

Furthermore, the application is heavily contingent upon mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under these conditions means that environmental harm would be addressed only at a later stage, hindering any thorough evaluation of effectiveness or residual impacts. This deferment of critical information to post-consent stages is procedurally unacceptable, contravening the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

In addition, the assessment is fraught with evidential deficiencies, including notable gaps in baseline data and limitations in methodology, while relying on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, especially when conclusions regarding negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold required under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal fails to comply with National Planning Framework 4, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The application has not adequately assessed alternatives, failing to meet the requirements of the Environmental Impact Assessment regime. Instead of a structured and reasoned comparison of realistic alternatives based on environmental effects, it offers a narrative account of the project's evolution. This method does not show that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

There is no clear or evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not demonstrate that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would probably be less severe. Given the sensitivity of the West Lewis coastline and the importance of proximity to the shore in determining impact, the lack of such analysis hinders any conclusion that the proposed siting is the least damaging option.

The shortcomings also apply to cable routing and landfall assessment. There is not enough evidence that alternative routes have been properly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been applied, relying instead on measures that would come after the design process.

Consequently, the application does not show that environmental harm has been minimised through site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, leaving the competent authority without a clear understanding of whether less harmful and more appropriate alternatives exist. Without a strong alternatives assessment, it cannot be determined that the proposal is a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, failing to provide an adequate understanding of the ecological receptors in the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system; however, the baseline data presented is insufficient, and the methodologies employed do not effectively capture the presence, behaviour, or habitat use of various species. Consequently, the assessment fails to establish a sound evidential basis for evaluating potential impacts.

A significant gap in the assessment pertains to otters, classified as a European Protected Species. The application neglects to properly recognise and evaluate their active utilisation of coastal areas for foraging and movement. The absence of consideration for their core foraging range and behavioural patterns leads to an inadequate assessment of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises the conclusions drawn regarding the absence of significant effects on this species.

Additionally, the assessment of basking sharks suffers from methodological shortcomings, particularly the reliance on aerial surveys which introduce notable detection bias under Atlantic conditions. Such an approach is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline and diminishes the reliability of the conclusions made.

These methodological deficiencies result in conclusions of negligible or non-significant effects that are based on assumptions rather than solid evidence. The lack of adequate baseline data hinders a meaningful assessment of cumulative and indirect impacts, including variations across seasons and broader ecosystem interactions. This creates uncertainty regarding the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment provided within the application exhibits significant deficiencies, characterised by internal inconsistencies and substantial gaps in evidence, which collectively undermine its conclusions. The west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to meet the necessary evidential standards to demonstrate that these species will remain unaffected. The proposed development is situated within critical foraging areas and migratory pathways, yet the assessment does not adequately analyse the implications associated with displacement, collision risk, or habitat loss.

A critical inconsistency arises from the developer's assertion of no significant adverse effects, which contradicts the pursuit of a Habitats Regulations derogation case, a process necessitated only when significant harm is anticipated. This contradiction raises serious concerns regarding the assessment's reliability and suggests that its conclusions lack adequate support from the underlying evidence. Moreover, the assessment does not sufficiently establish that seabirds connected with protected

sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively addressed, and reliance on modelling techniques introduces a degree of uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor presents an additional and serious risk, effectively forming a barrier along a primary flight path used by birds migrating between the United Kingdom and Iceland. The application fails to thoroughly assess the long-term consequences of continued mortality within this corridor, as well as the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to determine no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, coupled with data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and prohibits the lawful conclusion that would support consent.

The identified deficiencies also signify a non-compliance with the National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to substantiate that internationally significant seabird populations will not be adversely affected directly conflicts with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological flaws, and insufficient evidence. These weaknesses hinder a thorough evaluation of impacts and lead to the overall conclusion that the application fails to meet the statutory criteria essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, as it does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are intricately linked. Instead of acknowledging the ongoing social, cultural, and spiritual significance of heritage, the application reduces it to a collection of isolated, static assets.

There is a notable inadequacy in how culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, are evaluated. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as static features. This oversight fails to consider their current use, meaning, and the impact of development on their environment. Consequently, this leads to an incomplete assessment of cultural effects and neglects the essential role these sites play in community life.

Moreover, the evaluation does not encompass intangible cultural heritage, which includes 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 have been wholly overlooked in the assessment, representing a serious omission. Without the inclusion of these factors, the cultural impact of the proposed development cannot be accurately understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a distinct cultural identity that aligns with characteristics of an Indigenous People, yet the application has not undertaken a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to carry out this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to render a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal in direct conflict with National Planning Framework 4, particularly concerning the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, clearly deviates from policy expectations.

In summary, the combined failures to assess living heritage, intangible cultural value, community rights, and legal obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a solid basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal poses a potential threat to community identity and cohesion, as indicated by the developer's own findings which highlight "cultural loss." Despite this significant concern, the impacts have not been adequately incorporated into the main application or given the necessary consideration. The failure to disclose the full Social Impact Assessment obscures the true human and social cost associated with the development, creating an evidential gap that hinders public and authoritative understanding of the associated social risks.

Moreover, residents are currently experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal, as revealed through direct engagement. These impacts are concrete rather than speculative, yet the non-disclosure of the complete assessment restricts proper scrutiny of the findings and limits the ability to ascertain their significance in the decision-making process. The

assessment of social impacts, health, and wellbeing is deficient, lacking the transparency essential for a lawful evaluation.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm. However, the available evidence points to existing adverse effects that have not been fully addressed. Without the complete assessment, it is impossible to establish compliance with this policy.

The implications of this lack of transparency are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation due to the absence of the full Social Impact Assessment. This represents a significant omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

Ultimately, the combination of withheld information concerning the full Social Impact Assessment and the evidence of existing adverse impacts renders the overall assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and seascape impacts is inadequate, failing to reflect both the extent of change and the sensitivity of the environment. The character of the West Lewis coastline is marked by its open Atlantic horizon, undeveloped nature, and a distinct sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would establish a continuous industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

Moreover, the magnitude of visual change is not adequately represented in the application. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and detract from the essential qualities of naturalness and remoteness. The assessment does not properly convey this level of impact or its significance within such a sensitive landscape.

Methodological issues arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may overlook the most sensitive receptors and worst-case scenarios, particularly concerning significant cultural heritage sites and valued landscapes. This suggests a risk of understating the visual impact, thereby compromising the assessment's reliability.

Another significant gap is the lack of analysis regarding the interconnectedness of landscape, seascape, and cultural heritage. Prominent sites like the Calanais Standing Stones and other Scheduled Monuments are embedded within a broader landscape context, visually and spatially linked to the Atlantic horizon. The assessment isolates

these assets instead of acknowledging their interdependence, leading to an incomplete understanding of impacts on their setting and cultural importance.

The industrialisation of the seascape would sever these essential relationships, changing the context in which heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not only a visual impact but also a more extensive cultural and spatial detriment that remains insufficiently evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The scale of proposed change is at odds with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment undermines claims of policy compliance.

The impacts identified cannot be effectively mitigated, given the scale, height, and proximity of the turbines. Their presence would be dominant and unavoidable, leading to a fundamental and permanent change that cannot be reduced to an acceptable level through mitigation.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interconnectedness of landscape and heritage. These shortcomings impede a reliable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application presents a proposal that is fundamentally deficient in its assessment of construction and pollution risks, failing to provide the necessary detail for evaluating potential environmental effects. In a high-energy Atlantic environment, substantial seabed preparation and installation works are planned, yet the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. Instead, the application leans on the promise of future mitigation and contingency measures, to be formulated post-consent, which obstructs any genuine assessment of their adequacy or potential effectiveness.

Particularly troubling is the reliance on undefined future measures, given the sensitivity of the environment that the West Lewis coastline represents. This area is home to clean coastal waters and vital habitats that are susceptible to disturbances from sediment and contamination. While the application acknowledges risks associated with sediment mobilisation and potential chemical or oil spills, it does not offer sufficient detail on preventive, control, or monitoring strategies.

Moreover, uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation is a significant concern. Without rigorous modelling and well-defined management strategies, it remains impossible to

ascertain the extent, duration, or ecological implications of such impacts. This uncertainty also extends 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, which raises further alarms. By postponing the planning of contingency measures until after consent is granted, the application prevents a proper evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risk, which undermines the ability of the competent authority to adequately assess environmental protection measures during the determination process.

From a regulatory standpoint, the delay in establishing critical environmental safeguards stands in opposition to the requirements dictated by the Environmental Impact Assessment regime. It is essential that likely significant effects and corresponding mitigation are assessed before consent is granted, and when such information is absent, a lawful determination becomes impossible. Furthermore, the application fails to demonstrate compliance with policy stipulations regarding environmental protection and water quality.

In conclusion, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminates in a materially deficient assessment. These inadequacies hinder a robust evaluation of construction and pollution risks, thereby reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application does not adequately address the ecological or socio-economic impacts of the proposed development. It lacks a robust evaluation and fails to demonstrate how these vital habitats and activities can be protected or maintained without significant disruption.

A crucial concern is the flawed assumption that fishing activities can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressure resulting from displacement. This oversight is critical, as the risk of overfishing in other areas may threaten the local fleet's livelihoods. A clear, evidence-based assessment is necessary to understand the implications for fisheries and the associated economic conditions.

The proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. High-energy hammer piling for extended periods is expected to create disturbances over large areas, potentially affecting species such as dolphins. The anticipated disturbance to a significant proportion of the local bottlenose dolphin population raises serious issues, yet the application minimises these impacts without adequate evidence.

There exists an inconsistency within the application, wherein the need for licences to permit harm to European Protected Species is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction undermines the assessment's credibility and raises significant concerns regarding adherence to the Habitats Regulations, especially when potential harm necessitates legal authorisation.

Furthermore, the assessment inadequately considers the cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential for determining the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not substantiate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusion regarding its sustainability.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies contribute to 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 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 omission of an assessment regarding dark skies and nocturnal wildlife represents a significant flaw within the Environmental Impact Assessment. The coastline of West Lewis is noted for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over considerable distances, is likely to create a continuous and intrusive "wall of light" effect on the western horizon, fundamentally altering the night-time environment.

The impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors has not been considered in the application. This lack of assessment is particularly troubling given the vital role that dark skies play in the area's identity and the emerging sector of astro-tourism. As a result, there is a significant gap in the overall evaluation of landscape and environmental factors.

Furthermore, there is no evaluation of how the proposed lighting may affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit sensitivity to artificial lighting, which can result in disorientation and heightened collision risks. The absence of a lighting impact assessment or a study on phototaxis means that the potential effects of aviation lighting on these species, and

consequently their mortality rates, have not been addressed.

This issue is compounded by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities and their associated risks. Other species, including Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation due to artificial lighting, yet this risk has not been evaluated. The lack of site-specific data collected during night-time creates a critical gap in understanding the ecological impacts.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 concerning the protection of natural spaces and environmental quality. They also weaken the comprehensive assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the overall environment.

In summary, the failure to assess dark skies and nocturnal wildlife results in a considerable evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and inadequate for supporting a lawful determination.

TOURISM

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

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

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

In an island community with limited economic diversification, the lack of assessment on tourism impacts raises serious concerns about employment, local businesses, and

community sustainability. Furthermore, the omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been properly evaluated as required by the Islands (Scotland) Act 2018.

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

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

SUMMARY

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

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

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

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

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

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

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

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

Additional Comments

For all of the detailed grounds as stated I strongly object to this development.

I have visited Lewis and the Western Isles on many occasions for the peace and unspoiled natural beauty of the place. I have also a committed interest in the Gaelic culture having started a Gaelic group over ten years ago.

If this plan were to go ahead the damage and destruction of so much that makes this beautiful area a tourist spot could not be restored or healed. The essential 'dualchas' or heritage of this unspoilt area irreparably damaged or destroyed in so many ways. I like, so many others, were shocked at the news of this plan which should 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: AB240805

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 a review of the Environmental Impact Assessment Report and its supporting documents, highlighting significant planning, environmental, cultural, and procedural shortcomings. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the scale, proximity, and design of the proposal suggest it may not comply with statutory requirements, national policy, or sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is inconsistent and limited, and essential elements of the proposal remain unspecified. The employment of a flexible design framework obscures a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

There are also significant policy conflicts. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not prove that it can meet national mandates to protect biodiversity, climate interests, and environmental integrity. These conflicts challenge the statutory tests required for consent and hinder the competent authority's capacity to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, raises serious concerns about landscape capacity, visual dominance, and environmental impact. In light of the lack of adequate information, the dependence on undefined mitigation, evidential weaknesses, and clear non-compliance with policy, it is evident that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle must apply in these circumstances.

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment in the application fundamentally fails to meet the statutory requirements imposed by the Environmental Impact Assessment

regime. Instead of delivering a structured and reasoned comparison of viable alternatives predicated on their environmental impacts, the application merely recounts the evolution of the project. This narrative approach does not substantiate that less harmful options have been appropriately identified, evaluated, and preferred over more damaging ones.

The analysis lacks transparency and does not provide an evidence-based comparison regarding alternative offshore sites, development scales, or design configurations. Notably, the applicant has not convincingly demonstrated that the possibility of positioning turbines further offshore has been rigorously considered, despite the expectation that such a location could significantly lessen visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline highlights the crucial role of proximity to shore in determining potential impacts; thus, the absence of thorough analysis in this regard precludes any conclusion that the proposed siting is the least damaging option available.

The shortcomings extend to the assessments regarding cable routing and landfall, where there is inadequate evidence that alternative pathways have been comprehensively examined to mitigate impacts on sensitive receptors. Areas of cultural and spiritual significance, such as Barvas Cemetery, are inadequately protected due to the lack of a clear avoidance strategy and comparative analysis. This failure indicates that the principle of mitigation by design has not been implemented, with an over-reliance on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through careful selection of the site, layout, and routing of infrastructure. This represents a notable deviation from the established mitigation hierarchy and hampers the ability of the competent authority to ascertain the existence of less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it cannot be asserted that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency significantly undermines alignment with National Planning Framework 4, especially concerning the safeguarding of natural landscapes, cultural heritage, and the wellbeing of communities. The absence of a structured and comparative assessment constitutes a material shortcoming that leads to the overall conclusion that the application has not been sufficiently evaluated and fails to support a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant evidential gap. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and the tourism sector. The proposal introduces permanent red aviation lighting that will be visible over extensive distances, leading to a continuous and intrusive “wall of light” effect across the western horizon,

thereby fundamentally altering 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. This lack of consideration is particularly concerning given the significance of dark skies to the area's identity and the emerging sectors of astro-tourism. The omission of these impacts leads to a critical gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation regarding the effects of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The application does not present any lighting impact assessment or phototaxis study, thereby failing to determine how aviation lighting may influence these species or potentially increase mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been addressed. The absence of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it becomes 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 satisfied, invoking the precautionary principle and impeding a lawful determination.

From a policy perspective, this omission is at odds with National Planning Framework 4 regarding the protection of natural places and environmental quality. It further undermines the broader assessment of landscape and seascape impacts, as the character of night-time is an essential component of the environment.

In summary, the lack of assessment of 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 unable to support a lawful determination.

TOURISM

The assessment regarding the impacts on tourism is fundamentally inadequate, neglecting to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis. Tourism is intrinsically linked to the region's wild coastline, nearly untouched landscapes, dark skies, and the feeling of remoteness. While the application recognises that 86% of visitors are motivated by the scenery, it fails to provide a quantified evaluation of how large-scale offshore infrastructure would

influence visitor numbers, behaviours, or the overall economic contribution.

This sector has seen considerable growth, with revenues rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and making up approximately 16% of the island's economy. However, the application does not model the potential effects of seascape industrialisation and environmental degradation on Tourism Gross Value Added or the broader economic resilience. Such an absence of analysis means it is impossible to ascertain whether the development would offer a net economic advantage or jeopardise an established and flourishing sector.

The evaluation also overlooks the significance of environmental quality in sustaining tourism, failing to recognise how unspoiled landscapes and dark skies enhance visitor experiences and contribute to burgeoning markets such as nature-based tourism and astro-tourism. Furthermore, the lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable oversight regarding the impact on a recognised and expanding segment of the local economy.

In a community with limited economic diversification, neglecting the impact on tourism has broader implications for employment opportunities, local businesses, and the sustainability of the community. The omission of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been appropriately examined, as required under the Islands (Scotland) Act 2018.

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

The combined shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and acknowledging the island's economic dependence create a significant gap in evidence. This deficiency hinders a thorough assessment of economic effects, leading to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the primary issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not furnish a complete or reliable evidential basis for determination.

There are significant gaps in baseline data, and the continued use of an undefined

design envelope raises concerns. The reliance on unspecified mitigation measures and the omission of critical impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism effects, further undermine the application. As such, the Environmental Impact Assessment is incomplete and fails to provide a comprehensive understanding of the likely significant effects or residual impacts.

Procedural deficiencies are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the complete Social Impact Assessment represents a material omission, hindering the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings are substantial enough to render the application unfit for determination.

The proposal conflicts with National Planning Framework 4, failing to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate acceptable health and wellbeing impacts or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistently presented. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and thereby preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, 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 considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, inhibit a lawful and evidence-based decision. Therefore, the competent authority should refuse consent on these grounds or activate the relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

Scotland already consented more on- and offshore energy than it needs, even if you project the demand into the year 2050. Please look at the latest NESO report.

This windfarm wouldn't be financial viable without a guaranteed price as you can see in the West of orkney example, where the developers don't even want to pay the agreed transmission costs, claiming the windfarm wouldn't be financially viable if they would pay the agreed amount.

This all means the prices for electricity won't come down in the near future. The more we consent, the more we pay. So we should built as much as we need, not as much as we can.

I urge therefore every councillor to look at the actual numbers, not at the sales pitch. Look also where the profit of this windfarm goes, you will find, that it won't stay in Scotland.

There are furthermore no longterm jobs in this apart from construction, which will take between 12 and 24 months. To maintain these farm will only require a handful of people and they most likely won't be based in the hebrides. It is team touring an maintaniing them. The price the communities pay is high for no longterm jobs and no cheaper electricity prices.

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: DF55E458

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 applicable marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and accompanying documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The project is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. The design, scale, and proximity of the project raise serious concerns about its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There are notable gaps in critical environmental data, with baseline information being both limited and inconsistent. Several key elements of the proposal are not well-defined. Furthermore, the adoption of a flexible design framework complicates the assessment of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence to substantiate them.

There are also evident and substantial conflicts with policy. The proposal does not appear to align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to conclude that the development can be accepted under policy considerations.

The unprecedented scale of the proposal in this area, with large turbines being positioned in close proximity to the shoreline, raises significant issues related to landscape capacity, visual impact, and environmental effects. Collectively, the lack of adequate information, reliance on undefined mitigation measures, evidential deficiencies, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on environmental effects, it presents a narrative detailing the project's evolution. This method does not show that less harmful options have been properly identified,

assessed, and chosen over more damaging solutions.

A lack of transparent or evidence-based comparison is evident in the evaluation of alternative offshore locations, development scales, and design configurations. Notably, the application does not reflect that the developer has seriously considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the failure to include such analysis prevents any conclusion that the proposed siting is the least damaging option.

Deficiencies are also present in cable routing and landfall assessment, with insufficient evidence indicating that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been effectively implemented, instead relying 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 is a clear failure to adhere to the established mitigation hierarchy and hinders the competent authority's ability to determine whether less harmful and more appropriate alternatives exist. In the absence of a comprehensive alternatives assessment, it cannot be concluded that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises adherence to National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a significant material flaw that contributes to the overall conclusion that the application has not undergone adequate assessment and cannot support a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These locations are active burial sites and hold spiritual significance, yet they have been categorised as static features in the assessment. This approach neglects their ongoing use and meaning within the community and fails to address how the proposed development will impact their setting. Such mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their integral role in community life.

Moreover, the assessment disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions, along with the longstanding relationship between the community and the coastal environment. These elements are vital to the area's identity, yet they are completely omitted from the evaluation. Ignoring these factors means that the cultural impact of the development cannot be accurately

comprehended.

Community rights and engagement also remain inadequately addressed. The Gaelic-speaking population, which possesses characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to reflect established principles for participation in decisions that affect cultural and environmental interests.

A critical procedural failure is evident in the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfill its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone renders the determination unlawful.

From a policy standpoint, these shortcomings place the proposal at odds with National Planning Framework 4, particularly regarding the protection of historic assets and places. The lack of consideration for both tangible and intangible heritage, alongside a failure to recognise living cultural practices, constitutes a departure from policy requirements.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application insufficient for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment included focus groups with local residents, yet the full report remains unpublished. This situation creates a significant evidential gap that hinders both public understanding and the competent authority's ability to evaluate social risks identified in the developer's own research. Available summaries indicate that residents are experiencing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts, derived from direct engagement, are factual rather than speculative. However, the failure to disclose the complete assessment restricts proper scrutiny of the findings and limits the determination of their significance in the decision-making process.

Moreover, evidence suggests that the proposal threatens community identity and cohesion, with "cultural loss" identified in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment

process. A 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 absence of the full dataset means the application fails to provide a complete evidential basis for assessing the balance between benefits and harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development is expected to support positive health outcomes and mitigate harm; however, the available evidence points to existing adverse effects that have not been fully disclosed. Without the complete assessment, demonstrating compliance with this policy is not possible.

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

In summary, the failure to disclose the full Social Impact Assessment, combined with existing evidence of adverse impacts, leads to an incomplete and unreliable evaluation. This situation prevents a lawful determination and underscores that the application lacks sufficient information to be supported.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal to introduce large-scale turbines near the West Lewis coastline presents immediate and serious risks to both the environment and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped landscape, and a profound sense of remoteness. The placement of turbines in such proximity to the shoreline would create a persistent industrial presence, fundamentally transforming the landscape in a permanent and irreversible manner.

The assessment of visual impacts associated with this development is critically flawed, failing to convey the full extent of the proposed changes. The size and location of the turbines would lead to their dominance in views from residential areas, historic sites, and popular coastal locations. Consequently, this would severely diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The lack of an adequate representation of this impact, particularly within such a delicate landscape, is deeply concerning.

Moreover, there are significant methodological shortcomings regarding the selection and presentation of visual viewpoints. Current evidence indicates that the chosen viewpoints do not effectively encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, thus compromising the overall reliability of the assessment.

Additionally, the evaluation fails to address the intricate relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections with the Atlantic horizon. By treating these heritage assets as isolated elements, the assessment neglects their interdependence, resulting in an incomplete understanding of their settings 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 is not only a matter of visual intrusion but also signifies broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, which mandates the protection of natural environments and historic sites. The anticipated changes are at odds with the need to preserve landscape character, visual amenity, and the context of culturally significant locations. The lack of a comprehensive worst-case assessment further weakens any assertions of compliance with policy requirements.

It is evident that the impacts identified are not capable of effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be unavoidable and overwhelmingly dominant. The resulting changes are thus fundamental and permanent, incapable of being reduced to an acceptable level through mitigation strategies.

In summary, the assessment inadequately represents the scale of impact, the environmental sensitivity, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this important landscape.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure associated with this project is significantly inadequate and fails to account for the comprehensive impacts linked to what is fundamentally a single integrated initiative. The offshore turbines and the associated onshore works are fundamentally connected, yet they are analysed in isolation, leading to a disjointed approach that conceals the true magnitude of environmental and socio-economic ramifications.

The onshore components entail cabling traversing protected moorland, the establishment of a substation close to Stornoway, and the necessary access infrastructure through delicate landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically fragile habitat. The application lacks a thorough assessment of these effects, obstructing a complete understanding of the project's overall environmental impact.

By omitting or postponing the assessment of onshore consequences, the application

hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered collectively, yet the division between offshore and onshore components means the aggregate impacts on peatlands, habitats, and local communities remain unclear.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which enjoy policy protection. The application does not adequately show that impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This represents a significant evidential deficiency concerning biodiversity protection.

Furthermore, the routing of infrastructure through active croft land presents possible conflicts with existing land use and legal rights. The application fails to provide evidence that the requisite consents or procedures have been initiated, raising doubts about the project's feasibility and lawful execution.

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

Collectively, the separation of project elements, the absence of a comprehensive evaluation, and the lack of supporting evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The application does not consider the essential role of environmental quality in tourism. Unspoiled landscapes and dark skies enhance the visitor experience, and the absence of a Dark Skies Assessment leaves a significant gap regarding impacts on nature-based tourism and astro-tourism, which are growing markets. Without analysis of how industrialisation may affect Tourism Gross Value Added or economic resilience, it is unclear if the development would provide a net economic benefit or harm an important sector.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. It mirrors the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under an ostensibly stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still falls short.

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

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

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

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

acceptable impacts.

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

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

Additional Comments

Additional concerns regarding community benefit, or lack thereof. With the likely impact of development for infrastructure plus the offshore development this will adversely affect those living closest to the site in terms of disruption during development, visual impact, negative effects on local businesses, potential adverse effects on property values, long term damage on and offshore, what short term or lasting benefits are there? In an area of high fuel poverty and rural deprivation there should be meaningful investment and long term benefit for the community rather than large profit for the developers.

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: 5F9C11B3

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 regulations. A review of the Environmental Impact Assessment Report and accompanying documentation has revealed significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The development is proposed off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project, particularly regarding its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application does not provide an adequate evidential basis necessary for a lawful determination. Important environmental data is absent, and the baseline information is both limited and inconsistent, leaving many key elements of the proposal undefined. The flexible design framework utilised inhibits a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures means that their potential effectiveness cannot be accurately assessed. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not underpinned by robust evidence.

There exist substantial conflicts with established policy. The proposal appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly in regards to biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate considerations, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and undermine the competent authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, with large turbines situated near the shoreline, raises significant concerns related to landscape capacity, visual dominance, and environmental impact. When considered collectively, the lack of sufficient information, reliance on undefined mitigation, evidential shortcomings, and clear policy non-compliance illustrate that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is flawed and does not give a full or clear account of the environmental effects of the proposal. The use of a flexible Project Design Envelope means there are no specific commitments to turbine dimensions, layouts, or configurations. This creates uncertainty and complicates the application of a worst-case scenario, ultimately undermining the integrity of the assessment. As a result, the impacts described may not accurately reflect the actual development, leaving both the public and the competent authority unable to grasp the true extent of the environmental effects.

The application depends on mitigation measures, monitoring strategies, and management plans that have not been defined. This means consent is sought on the understanding that environmental harm will be dealt with later, which obstructs any meaningful evaluation of their effectiveness or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contradicts the aims of the Environmental Impact Assessment regime, which requires that significant effects and mitigation strategies are established prior to making decisions.

There are also serious gaps in evidence, such as missing baseline data and methodological limitations. Reliance on assumptions instead of site-specific evidence adds to the uncertainty regarding the impact's scale and significance. Conclusions of negligible or non-significant effects lack robust supporting data, and the insufficient information hampers a clear understanding of cumulative and worst-case impacts. This introduces scientific uncertainty that does not meet statutory requirements.

Consequently, the application does not satisfy the evidential threshold needed under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This brings the precautionary principle into play, especially concerning protected species and sensitive habitats. Additionally, the proposal does not comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, since it cannot be shown that impacts have been fully assessed or that suitable safeguards are established.

Overall, the reliance on an undefined design envelope, lack of specified mitigation, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a proper and lawful assessment of environmental effects, which means the competent authority cannot make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The 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 assessment of the ornithological impacts is fundamentally flawed, exhibiting significant gaps in evidence and internal inconsistencies that undermine its conclusions. The development site is situated in key foraging areas and migratory pathways along the west coast of the Isle of Lewis, which is home to internationally important seabird populations that are already experiencing decline. However, the application fails to convincingly demonstrate that these species will not be adversely affected. It does not adequately evaluate the risks associated with displacement, collision, or habitat loss for these birds.

There exists a fundamental contradiction within the application, as the developer claims 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 raises doubts about the reliability of the assessment and suggests that the presented conclusions lack support from the underlying evidence. Furthermore, the assessment does not sufficiently address the potential impacts on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. It does not fully consider the importance of their feeding grounds, and the reliance on modelling approaches adds a layer of uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used appear likely to underestimate mortality, especially where baseline data is inadequate and the behavioural responses of the birds are not thoroughly understood.

The placement of turbines within a recognised migratory corridor introduces additional significant risks, creating a barrier within a primary flight path utilized by species travelling between the United Kingdom and Iceland. The application does not sufficiently assess the long-term implications of sustained mortality in this corridor or the potential effects on species that have relatively small global populations.

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

Additionally, 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 important seabird populations will remain unaffected places the proposal in direct conflict with national policy.

Overall, the assessment is unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These shortcomings obstruct a robust evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to community identity and cultural heritage is fundamentally flawed and fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a simplified view, treating heritage as a collection of static assets rather than acknowledging their dynamic social, cultural, and spiritual roles within the community.

A significant shortcoming is evident in the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites of burial and spiritual practice, yet the assessment reduces them to mere static features, neglecting their ongoing use, significance, and the implications of

development on their surroundings. This mischaracterisation leads to an inadequate evaluation of cultural effects and overlooks their integral role in community life.

The assessment further neglects to address intangible cultural heritage, including the Gaelic language, traditions, and the long-standing connection between the community and the coastal environment. These elements are essential to the area's identity but are completely excluded from the evaluation, representing a considerable oversight. Without acknowledging these factors, the cultural impact of the proposed development cannot be accurately assessed.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population embodies a unique cultural identity akin to that of an Indigenous People, yet no process of Free, Prior and Informed Consent has been pursued. This lack of meaningful engagement compromises the assessment's credibility and fails to adhere to recognised principles of participation in decisions that impact cultural and environmental interests.

A further critical procedural error is the omission of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, thereby rendering a lawful determination impossible.

From a policy standpoint, these shortcomings place the proposal in direct conflict with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect to consider both tangible and intangible heritage, coupled with the failure to recognise living cultural practices, represents a clear deviation from established policy requirements.

Collectively, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not present a sufficient foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing associated with the proposal is inadequate and lacks the necessary transparency for a lawful evaluation. While the developer engaged local residents through a commissioned Social Impact Assessment and focus groups, the full report remains unpublished. This omission creates a considerable evidential gap, hindering both public understanding and the competent authority's ability to fully grasp the social risks highlighted by the developer's research.

Moreover, available summaries reveal that residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts stem from direct engagement, not speculation. However, without access to the

complete assessment, it is impossible to scrutinise the findings adequately or ascertain their significance within the decision-making framework.

There are also indications that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” mentioned in the developer’s own findings. Despite the recognition of these impacts, they have not been sufficiently integrated into the main application or given due consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost of the development.

This lack of transparency further undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be adversely affected. The failure to provide the complete dataset means the application does not present a comprehensive evidential basis for weighing benefits against 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, yet the available evidence suggests existing negative effects that remain undisclosed. Without the full assessment, it is impossible to prove compliance with this policy.

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

Collectively, the non-disclosure of the complete Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation precludes a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts on the seascape, landscape, and cultural heritage is insufficient and does not truly capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. Large-scale turbines placed near the shoreline would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct impact on visual amenity and detract from the naturalness and sense of remoteness

that define the area. The assessment does not accurately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that these viewpoints might not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the scale of visual impact may have been understated, which calls the reliability of the assessment into question.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated rather than interdependent results in a poor assessment of impacts on their setting and cultural significance.

The introduction of industrial elements to the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This presents not just a visual issue but also broader cultural and spatial harm that has not been sufficiently analysed within 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 change is at odds with the requirement to maintain landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. Consequently, the change would be fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment regarding construction and pollution risks lacks essential detail required for evaluating potential environmental effects. This proposal necessitates significant seabed preparation and installation operations within a high-energy Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans available. Instead, the application depends on mitigation and contingency measures that are to be developed after

consent, which impedes any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future measures is particularly alarming due to the sensitivity of the surrounding environment. The coastline of West Lewis is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to furnish sufficient information on the methods for prevention, control, or monitoring of these risks.

Moreover, there is ambiguity concerning the scale and behaviour of sediment plumes resulting from seabed disruption and cable installation. Without thorough modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also pertains to potential effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these issues. By postponing contingency planning to a post-consent phase, the application hinders the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and weakens the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of crucial environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated prior to consent, and the absence of such information renders lawful determination impossible. The application also fails to prove 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 collectively render the assessment materially deficient. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical concern is the assumption made within the application regarding the displacement of fishing activity, which is presented as a feasible option without acknowledging potential consequences. There is no evidence provided to support the

availability, accessibility, or capacity of alternative fishing grounds to accommodate any increased pressure. This significant omission raises concerns about overfishing in other areas and may have broader economic repercussions for the local fishing fleet. Consequently, without a clear and evidence-based assessment, the impacts on fisheries and the livelihoods they support remain poorly understood.

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

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

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

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

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

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 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 demonstrates significant deficiencies that undermine its compliance with sustainable development principles as outlined in statutory duties and national policy. Similar to the 2008 Lewis Wind Power proposal, which faced rejection due to unacceptable industrialisation, this application emerges under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing. However, it falls short in several critical areas.

The evidential basis provided is neither complete nor reliable, with notable gaps in baseline data and an undefined design envelope. There is an overreliance on unspecified mitigation measures, and essential impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been overlooked. Consequently, the Environmental Impact Assessment lacks the necessary depth to offer a clear understanding of significant effects and residual impacts.

Procedural issues further complicate the proposal. The absence of a compliant Island Communities Impact Assessment violates the Islands (Scotland) Act 2018, while the lack of a comprehensive Social Impact Assessment is a significant omission. These shortcomings hinder the competent authority's ability to evaluate the effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is fundamentally at odds with the National Planning Framework 4, failing to assure the protection of biodiversity, natural places, and cultural heritage. It does not adequately address health and wellbeing impacts, nor does it demonstrate a net economic benefit due to the absence of tourism impact modelling. The failure to properly assess the cumulative impacts of offshore and onshore components obscures potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain both uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, contradictory. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

This proposal is poised to cause considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual relationships, and adverse effects on tourism signify permanent changes that cannot be sufficiently mitigated.

In light of these concerns, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, policy conflicts, and unresolved environmental risks impede a lawful, evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be entirely refused.

Additional Comments

It was my understanding until recently that this development was “A done deal “. This impression has been reinforced recently in the campaigning going on for the upcoming local elections. I feel the council have been disingenous. I have attended several public consultations and felt overwhelmed and misinformed, understanding that what we were tasked to do was find solutions that would mitigate the worst outcomes of this development. I now discover that we have a genuine opportunity to say NO in the strongest possible terms.

I object principally from the standpoint of being both an ecologist and an artist. the visual impact on what is currently a wide, unspoilt landscape is detrimental. It is the SCALE of the development that is at fault. I do not object to the generation of wind power on a localised scale, in which the benefits are to the community or at least to Scotland. Visitors come to Lewis , perceiving it to be a “wild place”. This I realise is a

misunderstanding of the cultural history but what they seek cannot be quantified so easily in black and white. The scale of this development will diminish this spiritual dimension considerably.

The Environmental Impact Assessment seems flawed in my estimation and at odds with the designation of a Special Protection Area. The noise of construction will WITHOUT ANY DOUBT affect both Cetaceans and SeaBirds. several policies including NPF4 have been ignored.

There is much ambiguity and procedural uncertainty, A LACK OF TRANSPARENCY and a degree of white wash.

Lewis is a place of outstanding cultural heritage, Callanish is a World Heritage site and the Dark Skies are irreplaceable.

N4 is an abhorrence, an almost laughable proposal if it were not so serious. Who at the end of the day profits from such a development....I hear the arguments "jobs for the islands"....maybe, but at the expense of tourism income, based on the quality of landscape, and ecology.. these are things of lasting value of which we should be custodians.

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: 8061DFD9

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

Dear Sir/Madam

This representation serves as a formal objection to the 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 an examination of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely unspoiled environment, and rich cultural heritage. Concerns have been raised regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many elements of the proposal remain undefined. The flexible design framework employed hinders a clear understanding of the potential significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are not substantiated by credible evidence.

There are also evident and substantial conflicts with policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It fails to establish that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests needed for consent and weaken the capacity of the competent authority to determine the proposal's acceptability in policy terms.

Moreover, the scale of the project is unprecedented for this area, with large turbines situated in close proximity to the shoreline. This raises significant issues regarding landscape capacity, visual impact, and overall environmental consequences. When considered together, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and pronounced policy non-compliance highlight that the application is incomplete and cannot support a lawful determination. Therefore, under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential information and does not adequately detail the potential environmental consequences of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates substantial uncertainty. This situation hinders the assessment's integrity and results in potential discrepancies between the reported impacts and the actual development, leaving both the public and the competent authority without a clear understanding of the true environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental damage will be managed later prevents a thorough evaluation of the effectiveness and residual impacts of these measures. This postponement of critical information until after consent is granted is procedurally improper and contradicts the objectives of the Environmental Impact Assessment process, which stipulates that significant effects and mitigation strategies must be clearly outlined before a decision is made.

There are also notable shortcomings in evidence, including insufficient baseline data, methodological limitations, and the use of assumptions rather than site-specific information. These issues lead to uncertainty about the scale and significance of the impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting evidence. The lack of comprehensive information hampers the understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that does not align with statutory expectations.

As a result, the application does not meet the evidential criteria set by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to show compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, lack of specified mitigation measures, and deficiencies in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These flaws impede a lawful and comprehensive evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant shortcomings in its assessment of alternatives, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their environmental effects, the submission provides a narrative on project evolution. This method does not adequately demonstrate that less

harmful options have been properly identified, assessed, and preferred over more damaging solutions.

Furthermore, there is a lack of transparent and evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not illustrate that the developer has adequately considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Given the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the failure to include such an analysis precludes any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence indicating that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis highlight that the principle of mitigation by design has not been implemented, resulting in an over-reliance on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a failure to adhere to the established mitigation hierarchy, which hampers the ability of the competent authority to ascertain whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be confidently stated that the proposal is sustainable or compliant with relevant policy.

From a policy standpoint, these deficiencies significantly undermine adherence to National Planning Framework 4, particularly regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a critical omission, contributing to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species demonstrates significant deficiencies, failing to offer a thorough or dependable understanding of the ecological receptors within the West Lewis coastal environment. This region is a highly sensitive and biologically active marine system, yet the baseline data provided is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a sound evidential basis for evaluating potential impacts.

A critical gap is evident in the evaluation of otters, a species protected under European law, as the application does not adequately recognise or assess their active utilisation

of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been sufficiently evaluated. This deficiency undermines any assertions regarding the absence of significant effects on this species.

Further inadequacies are present in the assessment of basking sharks, where the reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This approach likely underestimates the presence of these sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly consider such data leads to an incomplete baseline, undermining the reliability of the conclusions drawn.

These methodological shortcomings imply that any conclusions of negligible or non-significant effects are rooted in 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 creates uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to 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 introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. In light of these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment contains significant flaws, revealing substantial gaps in evidence and inconsistencies that challenge its findings. The Isle of Lewis's west coast is home to internationally important seabird populations, many of which are already experiencing decline. However, the application does not adequately prove that these species will not be negatively impacted. It is situated in crucial foraging areas and migratory routes, yet the assessment inadequately considers the risks of displacement, collision, or habitat loss.

There is a notable contradiction in the application: the developer claims there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically necessary when significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that its conclusions lack

support from the underlying evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The significance of these feeding areas is not thoroughly addressed, and the reliance on modelling introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies used are likely to underestimate mortality rates, especially given incomplete baseline data and insufficient understanding of behavioural responses.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a narrow viewpoint, treating heritage as a collection of isolated and unchanging assets, failing to recognise their ongoing social, cultural, and spiritual significance within the community.

There are notable deficiencies in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites remain active places for burial and spiritual practices, yet the assessment categorises them merely as static features, neglecting their current use, significance, and the development's potential impact on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These components are essential to the area's identity but are entirely missing from the assessment, marking a considerable oversight. Without these factors being accounted for, the true cultural impact of the development remains inadequately understood.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population, characterised by a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to uphold established principles regarding participation in decisions that affect cultural and environmental matters.

A significant procedural gap is 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. This omission alone hampers a lawful determination.

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

Overall, the neglect of living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development have not been adequately assessed, and the application fails to establish a sufficient foundation for evaluating the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposal is fundamentally inadequate and lacks the necessary transparency for a lawful assessment. Although the developer engaged in a Social Impact Assessment that included local residents through focus groups, the complete report remains unpublished. This significant evidential gap hinders both the public and the competent authority from grasping the full extent of the social risks identified by the developer's own research.

Residents have reported experiencing measurable stress, anxiety, and concern resulting from the scale and proximity of the proposed development. These impacts, arising from direct engagement with the community, are based on real experiences rather than speculation. Nonetheless, the absence of the full assessment inhibits proper examination of these findings and restricts the ability to assess their

implications in the decision-making process.

Furthermore, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition, these significant impacts have not been fully accounted for in the main application or given the necessary weight. The lack of transparency surrounding the full Social Impact Assessment obscures the true human and social costs associated with the development.

This deficiency in transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this nature, particularly when community character and functionality may be at stake. By failing to provide the complete dataset, the application lacks a thorough evidential basis for weighing benefits against potential harms.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence available points to existing adverse effects that have not been fully revealed. Without the complete assessment, compliance with this policy cannot be established.

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 full Social Impact Assessment. This represents a significant omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing negative impacts, renders the assessment incomplete and unreliable. This deficiency precludes a 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, failing to adequately capture the extent of change or the sensitivity of the receiving environment. The West Lewis coastline features an open Atlantic horizon, retains an undeveloped character, and exudes a strong sense of remoteness. The proposed large-scale turbines, situated near the shoreline, would introduce a continuous and dominant industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Furthermore, the application does not accurately represent the magnitude of the anticipated visual change. The size and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, thereby directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. This level of impact and its significance within such a sensitive

landscape context are inadequately conveyed in the assessment.

There are also concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, compromising the assessment's reliability.

Moreover, the evaluation fails to address the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. The assessment considers these assets in isolation, neglecting their interdependence, which leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not just a visual impact but also a wider cultural and spatial harm that remains inadequately assessed within the application.

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which is intended to protect natural areas and historic assets. The scale of proposed changes is at odds with the requirement to preserve 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.

Additionally, 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. The resulting change is thus fundamental and permanent, making it impossible to reduce the impact to an acceptable level through any mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The assessment presented in the application is inadequate, particularly in its evaluation of fisheries and marine life, failing to provide a thorough examination of ecological and socio-economic impacts. The waters off the West Lewis coast are known for supporting a rich marine ecosystem and a significant fishing industry. However, the application does not adequately demonstrate that these vital uses and habitats can be preserved or sustained without considerable disruption.

A major concern is the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to support claims that alternative fishing grounds are available, accessible, or capable of accommodating increased pressure. This gap is crucial, as such displacement could lead to overfishing in other areas, potentially resulting in broader economic consequences for the local fishing fleet. The

absence of a clear, evidence-based assessment means the effects on fisheries and local livelihoods remain inadequately understood.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The extensive use of high-energy hammer piling 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 raises serious concerns, yet the application diminishes the importance of these effects, lacking sufficient supporting evidence.

There is also a troubling inconsistency within the application, which acknowledges the requirement for licences to permit harm to European Protected Species while simultaneously asserting that impacts are negligible. This contradiction calls into question the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, especially where harm is expected to such an extent that it necessitates legal authorisation.

Additionally, the assessment fails to take into account cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these collective effects, it is impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate 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 precludes any conclusion that this proposal represents sustainable development.

Collectively, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings hinder a comprehensive evaluation of the 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 application for development lacks a thorough assessment of both dark skies and nocturnal wildlife, which is a significant oversight in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which contribute to the area's environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will create a continuous "wall of light" that will disrupt the natural night-time environment across the western horizon.

There is no evaluation of how this lighting will affect visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning

given the role of dark skies in the area's identity and in promoting emerging sectors such as astro-tourism. The failure to assess these impacts represents a clear omission in the overall assessment of the landscape and environment.

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

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

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

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

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, with growth from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not adequately assess how the proposed large-scale offshore infrastructure could affect tourism, particularly regarding visitor numbers and behaviours, which are heavily influenced by the area's natural attributes such as its wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the absence of a detailed analysis leaves significant gaps in understanding the potential economic consequences of the development.

The failure to evaluate how the industrialisation of the seascape might impact Tourism Gross Value Added and the broader economic resilience of the island is concerning.

Without this crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or risk undermining a vital and expanding sector. Additionally, the assessment overlooks the critical role that environmental quality plays in supporting tourism, particularly concerning unspoiled landscapes and dark skies, which are essential for both visitor experiences and niche markets like nature-based tourism and astro-tourism.

Moreover, the lack of a Dark Skies Assessment exacerbates this issue, creating a significant oversight regarding a growing segment of the local economy. For an island community that relies heavily on tourism and has limited economic diversification, the failure to evaluate the impacts on this sector poses broader implications for local employment, businesses, and overall community sustainability. The absence of a compliant Island Communities Impact Assessment further indicates that these economic vulnerabilities have not been addressed as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning the economic impacts and the necessity of showing net benefits. It also contradicts strategic goals that prioritise tourism as a growth sector, lacking sufficient evidence for the competent authority to accurately assess the economic implications of the proposal. Collectively, the failure to quantify tourism impacts, evaluate the environmental drivers influencing visitor behaviour, and consider the island's economic dependency leads to a substantial evidential gap, hindering a thorough evaluation of potential economic effects and reinforcing the notion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against statutory duties and national policy. It shares significant issues with the 2008 Lewis Wind Power proposal, which was rejected due to unacceptable industrialisation. Now, it is put forward under a more robust policy framework that places greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

The application lacks a complete and reliable evidential basis. There are serious gaps in baseline data, reliance on an undefined design envelope, unspecified mitigation measures, and omitted key impact pathways, including nocturnal wildlife, full onshore infrastructure, and tourism effects. The Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are clear procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. Such deficiencies hinder the competent authority's ability to assess impacts on community wellbeing, cultural identity, and economic resilience, rendering

the application unsuitable for determination.

Furthermore, the proposal contradicts National Planning Framework 4. It does not demonstrate protection of biodiversity, natural places, or cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring 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 inconsistent in places. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been met, thus invoking the precautionary principle and preventing a lawful conclusion 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 represent permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The significant information deficiencies, alongside policy conflicts and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must either refuse consent on these grounds or invoke the relevant regulatory provisions to require 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

In this day and age we must preserve such beautiful, unspoiled areas and conserve the wildlife for future generations and for those living in the area, many of whose families have lived there for generations. It is madness to even consider this project!

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: 67B7C3DF

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough examination of the Environmental Impact Assessment Report and its supporting documents has revealed significant deficiencies in planning, environmental considerations, cultural impacts, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its stunning Atlantic-facing coastline, near-pristine surroundings, and rich cultural heritage. The design, scale, and proximity of the wind farm raise profound questions about its alignment with statutory obligations, national policy, and the principles governing sustainable development.

Fundamentally, the application lacks a sufficient evidential foundation for a lawful decision. Key environmental data is notably absent, and the baseline information provided is limited and inconsistent. Moreover, crucial elements of the proposal remain undefined. The flexible design framework employed hinders a clear assessment of potential significant effects, and the reliance on unspecified mitigation measures prevents a proper evaluation of their effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community implications, leaving claims of negligible or non-significant effects unsupported by solid evidence.

There are evident and serious conflicts with established policies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment requirements, or National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and public health and wellbeing. It does not prove that it can meet national obligations to safeguard biodiversity, address climate issues, and maintain environmental integrity. These discrepancies directly challenge the statutory requirements for consent and weaken the authority's capacity to deem the development acceptable from a policy perspective.

The unprecedented scale of this proposal raises additional concerns, particularly with the large turbines being sited in close proximity to the shoreline. This introduces significant worries about landscape capacity, visual impact, and broader environmental ramifications. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations illustrate 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 Environmental Impact Assessment Report exhibits significant deficiencies and fails to deliver a complete, transparent, and dependable account of the likely environmental effects associated with the proposal. The reliance on a flexible Project Design Envelope, which lacks a commitment to definitive turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty compromises the integrity of the assessment, obscuring the true extent of environmental impacts from both the public and the competent authority, thereby hampering informed decision-making.

Moreover, the application places substantial emphasis on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent with the understanding that environmental harm will be rectified later inhibits any meaningful evaluation of these measures' effectiveness and the assessment of residual impacts. This deferment of crucial information to stages following consent is procedurally unacceptable and stands in opposition to the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are clearly identified before any determination is made.

Furthermore, the report suffers from serious evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of the impacts, particularly when conclusions regarding 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 and introduces scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold stipulated under the Habitats Regulations, as it fails to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as there is no evidence that impacts have been thoroughly assessed or that suitable safeguards are in place.

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies preclude 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 current proposal fails to provide a comprehensive assessment of marine ecology and protected species, particularly within the West Lewis coastal environment, which is known for its biological activity and sensitivity. The existing baseline data is

inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, there is no reliable evidential basis for assessing impacts.

Significantly, the application does not adequately recognise the presence and activities of otters, a species protected under European law, in coastal areas where they forage and move. The failure to evaluate their core foraging range and behavioural patterns leaves a gap in understanding the potential impacts from construction activities, noise, and increased human presence. This omission compromises any assertions made regarding the lack of significant effects on otters.

The assessment of basking sharks also reveals critical deficiencies, as reliance on aerial surveys introduces a considerable detection bias that is particularly pronounced in Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established observations from land-based surveys that show frequent use of these waters. The neglect to incorporate or adequately consider such vital data contributes to an incomplete baseline and undermines the reliability of the findings presented.

The methodological shortcomings lead to conclusions regarding negligible or non-significant effects being based on mere assumptions, rather than on robust evidence. Moreover, the lack of sufficient baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation results in uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the stipulations of the Environmental Impact Assessment framework or the National Planning Framework 4. The inadequate identification and assessment of protected species introduce uncertainty that prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is not lawful to grant consent.

In summary, the deficiencies stemming from incomplete baseline data, flawed methodologies, and unsubstantiated conclusions culminate in an unreliable assessment. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted is deeply flawed, exhibiting serious internal inconsistencies and significant gaps in evidence that undermine its findings. The application does not meet the necessary evidential standard to demonstrate that the internationally important seabird populations along the west coast of the Isle of Lewis, which are already experiencing declines, will not be adversely impacted. Key foraging areas and migratory pathways are within the development's location; however, the assessment

inadequately addresses the risks associated with displacement, collision, and habitat loss.

A critical contradiction arises in the application, where the developer asserts there are no significant adverse effects while simultaneously submitting a Habitats Regulations derogation case, which is typically invoked when significant harm is anticipated. This inconsistency raises serious doubts about the credibility of the assessment, indicating that the conclusions drawn are not backed by the requisite evidence. Furthermore, there is insufficient evidence presented to confirm that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds has not been adequately considered, and the reliance on modelling techniques introduces further uncertainty, particularly for species like Kittiwakes and Fulmars that are already in critical decline. The methodologies employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the lack of comprehensive understanding of behavioural responses.

The placement of turbines within an established migratory corridor poses an additional severe risk, effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The assessment fails to sufficiently evaluate the long-term implications of ongoing mortality in this corridor, as well as the potential repercussions for species with small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to conclude that there would 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 achieved. This situation invokes the precautionary principle, obstructing a lawful conclusion that would support the granting of consent.

Moreover, the identified deficiencies represent a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to assure that internationally important seabird populations will remain unaffected positions the proposal in direct opposition to national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity surrounding the proposed development is severely lacking. It fails to recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community intertwine. Instead, the application takes a simplified view, treating heritage as a collection of static assets rather than acknowledging their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment inadequately addresses culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active places for burial and spiritual practice, yet they are portrayed as static features, overlooking their current usage and the development's impact on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural effects and ignores their importance in community life.

The application also disregards intangible aspects of cultural heritage, such as the Gaelic language and local traditions. These components are essential to the identity of the area, yet they are notably absent from the assessment, marking a significant oversight. Without evaluating these factors, it becomes impossible to fully grasp the cultural implications of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking community has a distinct cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to comply with established participation principles for decisions affecting cultural and environmental interests.

A critical procedural gap exists due to the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone is sufficient to hinder a lawful determination.

From a policy standpoint, these shortcomings directly conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, represents a significant departure from policy requirements.

Overall, the inadequacies in assessing living heritage, intangible cultural value, community rights, and legal obligations create a substantial evidential gap. The cultural impacts of the development remain unassessed, and the application fails to offer a solid foundation for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, which is essential to its undeveloped character. The proposal for large-scale turbines in close proximity to the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The magnitude of visual change associated with this application is inadequately represented. The scale and proximity of the turbines would dominate views from

residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the defining qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints in the assessment. Evidence indicates that these viewpoints may not fully capture the sensitivity of key cultural heritage sites or the worst-case scenarios, particularly concerning high-value landscapes. This raises the risk of underestimating the magnitude of visual impact, which undermines the reliability of the assessment.

Furthermore, there is a notable deficiency in assessing the interconnectedness of landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a wider landscape context linked to the Atlantic horizon. The assessment treats these heritage assets in isolation rather than recognising their interdependence, resulting in an incomplete evaluation of impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever these vital connections, disrupting how heritage assets are experienced in relation to the natural horizon. This represents not only a significant visual impact but also broader cultural and spatial harm that has not been adequately assessed.

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 setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any assertions of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal's assessment of construction and pollution risks is notably inadequate, failing to provide the necessary detail for evaluating potential environmental effects. Notably, significant seabed preparation and installation activities will occur within a high-energy Atlantic environment. However, the application lacks fully developed Construction Environmental Management Plans and Pollution Prevention Plans, relying instead on mitigation and contingency measures that will be formulated after consent.

This approach hinders any meaningful assessment of the adequacy or effectiveness of these measures.

Particularly alarming is the reliance on undefined future measures, given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

Furthermore, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes created by seabed disturbance and cable installation. Without comprehensive modelling and clearly defined management strategies in place, it is impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty is compounded by 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 intensifies these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are established to address pollution events. Such a deferral introduces procedural risks and diminishes the ability of the competent authority to assess environmental protection measures effectively at the point of determination.

From a regulatory standpoint, this deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Assessments of likely significant effects and mitigation must occur prior to consent, and the absence of such information precludes a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies highlighted by the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially inadequate. These shortcomings inhibit a thorough evaluation of construction and pollution risks, further substantiating the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment surrounding fisheries and marine life associated with the proposal is inadequate and does not offer a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support a vital fishing industry. However, the application fails to adequately demonstrate that these habitats and uses can be preserved or maintained without causing significant disruption.

A critical concern is the presumption that fishing activities can be displaced without

repercussions. There is no evidence provided within the application to suggest that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure. This lack of information is crucial, as the potential for displacement poses risks of overfishing in other areas, which could have broader economic implications for the local fishing fleet. Without a clear and evidence-based assessment, understanding the impacts on fisheries and livelihoods remains elusive.

Moreover, the proposal brings forth considerable risks to marine species, particularly due to the underwater noise produced during construction. The extensive high-energy hammer piling anticipated is likely to disrupt marine life over significant distances, with particular concern for species such as dolphins. The predicted disturbance affecting a large portion of the local bottlenose dolphin population is alarming, yet the application minimizes the importance of these effects, lacking adequate supporting evidence.

There exists a notable inconsistency within the application, as it acknowledges the necessity for licences to permit harm to European Protected Species while simultaneously characterising these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding adherence to the Habitats Regulations, especially when harm is expected to a degree that warrants legal authorisation.

The assessment also neglects to evaluate the cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a holistic assessment of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not prove compliance with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or avoid unacceptable consequences for marine biodiversity, which inhibits any conclusion regarding the sustainability of the proposal.

In summary, the deficiencies in evidence concerning fishing displacement, the minimisation of acoustic impacts, and internal contradictions collectively 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 presents a fragmented assessment of onshore infrastructure, which fails to fully address the integrated nature of the project. The offshore turbines and associated onshore works are fundamentally linked, yet the current evaluation treats them separately, leading to an incomplete understanding of the environmental and socio-economic impacts.

The onshore works entail significant developments, such as cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access

infrastructure through sensitive landscapes. These activities will involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. As it stands, the application does not provide a thorough assessment of these impacts, thus failing to convey 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 stipulates that all elements of a project must be considered collectively. However, the disjunction between offshore and onshore components leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are notable risks posed to sensitive habitats, including machair systems and peatland environments, which are protected under existing policy. The application lacks sufficient evidence to show that these habitats have been thoroughly assessed or that suitable avoidance measures are in place, revealing a significant gap in biodiversity protection.

Concerns regarding carbon balance are also raised by the proposal. Disturbing peatland can release stored carbon, potentially incurring a carbon debt that contradicts the goals of renewable energy development. The application fails to sufficiently address this matter or to demonstrate that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land may lead to conflicts with established land use and legal rights. The application does not present evidence indicating that the necessary consents or processes have been undertaken, thereby casting doubt on the project's deliverability and lawful execution.

From a policy standpoint, the inability to assess the project comprehensively and to show that peatlands, habitats, and land use interests are protected stands in contradiction to the National Marine Plan and National Planning Framework 4. The lack of evidence demonstrating that impacts can be avoided or mitigated further compromises the application.

In conclusion, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence concerning environmental and land use impacts lead to an incomplete and unreliable application, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal fails to include any assessment of dark skies and nocturnal wildlife, which constitutes a material omission in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, an important aspect of environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting will be visible over long distances, creating a continuous and intrusive

“wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting will affect visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is significant considering the value of dark skies to the area’s identity, particularly as emerging sectors like astro-tourism gain importance. The absence of such assessments represents a clear gap in the overall landscape and environmental evaluation.

Moreover, there is no examination of potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The lack of a lighting impact assessment or phototaxis study prevents an understanding of how aviation lighting might affect these species or lead to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, for instance, may forage or migrate at night and are vulnerable to disorientation from artificial lighting; yet, this risk has not been addressed. The absence of site-specific night-time data results in a critical shortfall in understanding the ecological impacts involved.

Without an assessment of these nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The requisite evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and preventing a lawful determination.

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

In conclusion, the failure to assess 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 evaluation of tourism impacts within the application is insufficient, neglecting the economic and social effects on a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, nearly untouched landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, there is no quantitative assessment provided regarding how

large-scale offshore infrastructure might influence visitor numbers, their behaviours, or the broader economic contributions they make.

The significance of tourism on the island is highlighted by its growth from £65 million in 2017 to over £81.5 million, with more than 1,000 jobs supported and tourism accounting for up to 16% of the economy. However, the application fails to examine how the potential industrialisation of the seascape and the degradation of environmental quality would affect Tourism Gross Value Added or the overall economic resilience of the area. Without this critical analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or instead compromise a crucial and flourishing sector.

Moreover, the importance of environmental quality in promoting tourism has not been addressed, particularly regarding how unspoiled landscapes and dark skies enhance visitor experiences and cater to emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this inadequacy, creating a notable deficiency in understanding the impacts on this recognised and expanding segment of the local economy.

Given the context of an island community with limited economic diversification, the neglect of tourism impact assessments raises broader concerns for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefits. It also runs counter to strategic objectives that prioritise tourism as a growth sector, lacking the necessary evidence for the competent authority to adequately assess the economic ramifications of the proposal.

Collectively, the failure to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and recognise the island's economic reliance leads to a significant evidential gap. This gap hinders a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as dictated by statutory duties, national policy, and evidential requirements. The issues inherent in this proposal mirror those 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 submitted under an enhanced policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it fails to address these critical elements.

There are substantial deficiencies in the evidential basis provided for this determination. The application lacks comprehensive baseline data, relies on an ill-defined design envelope, and incorporates unspecified mitigation measures. Moreover, it fails to address essential impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, which hinders a thorough understanding of likely significant effects and residual impacts.

Procedural inadequacies are also evident, particularly the absence of a compliant Island Communities Impact Assessment, which constitutes a breach of the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the failure to provide a complete Social Impact Assessment is a material omission. These shortcomings obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal is in clear conflict with National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural places, and cultural heritage. Additionally, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The assessment of the cumulative impacts of both offshore and onshore components has not been adequately addressed, thus obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard necessary to conclude that adverse effects can be excluded beyond reasonable scientific doubt has not been met, which invokes the precautionary principle and obstructs a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is poised to induce substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual connections, and the impacts on tourism all represent enduring effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The significant deficiencies in information, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. It is imperative that the competent authority refuses consent on these grounds or utilises the appropriate regulatory provisions to mandate the submission of the required information.

For these reasons, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

Additional Comments

To impact the isle of lewis in this way is a desecration.

It is one of the most important spiritual areas Scotland has and is also an important site for Scotland's tourism industry renowned for its unspoiled water and views especially coastal.

The impact of associated infrastructure on this important archaeological landscape is unacceptable

Scotland is already producing more electricity than it needs and all development of windfarms and associated infrastructure must be put on hold till an adequate assessment of what is already operational and in planning is made.

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: 7F7A6FE0

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

Dear Sir/Madam

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

The application is deficient in providing a solid evidential foundation for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Many essential aspects of the proposal remain undefined. The flexible design framework employed complicates an accurate assessment of likely significant effects, while the reliance on unspecified mitigation measures prevents an evaluation of their effectiveness. Consequently, the documentation does not afford a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust evidence to support them.

There are significant conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national standards aimed at safeguarding biodiversity, climate objectives, and environmental integrity. Such conflicts directly affect the statutory tests necessary for granting consent and impair the competent authority's ability to conclude that the development aligns with policy requirements.

The unprecedented scale of this proposal, with large turbines positioned dangerously close to the shoreline, raises major concerns about landscape capacity, visual dominance, and environmental repercussions. Together, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

Additionally, the report suffers from serious evidential deficiencies. There are notable gaps in baseline data and limitations in the methodology employed, with a tendency to rely on assumptions rather than site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application lacks a comprehensive evaluation of alternatives, failing to meet the requirements set by the Environmental Impact Assessment regime. Instead of offering

a structured comparison of feasible options based on their environmental impacts, it merely narrates the evolution of the project. This narrative does not sufficiently demonstrate that less harmful alternatives have been duly identified, assessed, and chosen over more detrimental solutions.

There is an evident absence of transparent, evidence-based comparisons regarding different offshore locations, scales of development, or design configurations. Notably, the application does not indicate that the developer has genuinely considered placing the turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The West Lewis coastline is particularly sensitive, and the critical significance of proximity to shore in gauging impact highlights the inadequacy of the analysis presented, as it precludes any conclusion that the proposed site is the least harmful option.

The shortcomings are also apparent in the evaluation of cable routing and landfall assessments, where there is inadequate evidence that alternative routes have been thoroughly examined to mitigate impacts on sensitive receptors, including culturally significant areas like Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that the design has not incorporated effective mitigation, instead relying on measures that would be applied after the design phase.

Consequently, the application fails to prove that environmental harm has been minimised through thoughtful site selection, layout, and infrastructure routing. This oversight represents a departure from the established mitigation hierarchy, inhibiting the competent authority's ability to ascertain whether there are less harmful and more suitable alternatives. Without a thorough assessment of alternatives, it is impossible to conclude that the proposal aligns with sustainable and policy-compliant practices.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly regarding the protection of natural landscapes, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a significant oversight that reinforces the overall assessment that the application has not undergone adequate scrutiny and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is significantly flawed, lacking a comprehensive understanding of ecological receptors within the West Lewis coastal environment. This area is a sensitive and biologically rich marine system, yet it is evident that the baseline data provided is incomplete. The methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat utilisation, leading to an unreliable evidential basis for evaluating potential impacts.

One notable gap in the assessment pertains to otters, classified as a European

Protected Species. The application does not properly acknowledge or evaluate their active use of coastal regions for foraging and movement. By failing to consider their core foraging range and behavioural habits, the assessment inadequately addresses the potential impacts of construction-related disturbances, noise, and increased activity, undermining any assertions regarding the absence of significant effects on this species.

Further issues are apparent in the evaluation of basking sharks, where a reliance on aerial surveys introduces substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, particularly when compared to established land-based observations, which indicate a frequent utilisation of these waters. The oversight of relevant data leads to an incomplete baseline, diminishing the reliability of the conclusions drawn.

Due to these methodological shortcomings, the conclusions that suggest negligible or non-significant effects appear to be based on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates a level of uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to align with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as it does not appropriately identify or assess protected species. This introduction of uncertainty prevents the possibility of excluding adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Consequently, under these circumstances, consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, ineffective methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application does not possess a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the application exhibits significant deficiencies, marked by notable gaps in evidence and contradictions that diminish its credibility. It is essential to recognise that the west coast of the Isle of Lewis is home to seabird populations of international importance, many of which are already experiencing decline. However, the application fails to adequately demonstrate, to the necessary evidential standard, that these species will not face adverse impacts. The development's location within critical foraging areas and migratory pathways further exacerbates the issue, as the assessment does not thoroughly analyse potential displacement, collision risks, or habitat loss.

A critical inconsistency within the application arises from the developer's assertion that

there will be no significant adverse effects, coupled with the pursuit of a Habitats Regulations derogation case. Such a case is only necessitated when significant harm is anticipated. This contradiction raises serious questions regarding the assessment's reliability, suggesting that the conclusions drawn are unsupported by the foundational evidence.

Furthermore, the assessment lacks sufficient evidence to ensure that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not comprehensively acknowledged, and the reliance on modelling techniques brings uncertainty, particularly concerning species in steep decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underreport mortality rates, particularly in the absence of complete baseline data and a full understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses substantial risks, essentially creating an obstruction in a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately assesses the long-term consequences of ongoing mortality within this corridor or the potential ramifications for species with relatively small global populations.

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

Moreover, the identified deficiencies signify a failure to comply with National Planning Framework 4 concerning biodiversity protection and the conservation of natural assets. The inability to demonstrate that internationally significant seabird populations will remain unharmed places the proposal in direct opposition to national policy.

In summary, the assessment's reliability is undermined by internal inconsistencies, methodological flaws, and insufficient evidence. These shortcomings inhibit a comprehensive evaluation of the impacts and collectively indicate that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of the application reveals significant shortcomings in addressing cultural heritage and community identity, particularly in relation to the West Lewis coastline, which is a dynamic cultural landscape where environment, language, tradition, and community are intricately linked. The assessment adopts a narrow view, treating heritage merely as isolated and static features, rather than recognising their ongoing social, cultural, and spiritual importance to the community.

A major flaw in the assessment is the handling of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet they are mischaracterised as static elements, overlooking their continued relevance and the potential impacts of development on their surroundings. This inadequate portrayal leads to a superficial evaluation of cultural effects and neglects their vital role in community life.

Moreover, the assessment fails to acknowledge intangible cultural heritage aspects, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These factors are crucial to the area's identity but are entirely omitted from the evaluation, leading to a critical gap in understanding the cultural impact of the development.

Concerns about community rights and engagement also arise, particularly given that the Gaelic-speaking population has a distinct cultural identity akin to that of Indigenous Peoples. The absence of a Free, Prior and Informed Consent process undermines the validity of the assessment and fails to adhere to recognised principles for participation in decisions that affect cultural and environmental interests.

A significant procedural oversight is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic implications for the island community. This omission prevents any lawful determination regarding the development.

From a policy standpoint, these inadequacies directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the neglect of living cultural practices, constitutes a clear violation of established policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the proposed development have not been adequately evaluated, resulting in an insufficient basis for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioned Social Impact Assessment, which included focus groups with local residents, has not had its full report published. This lack of disclosure represents a significant evidential gap that impedes both the public and the competent authority from comprehending the complete range of social risks uncovered by the developer's own research. Without access to the full assessment, the ability to properly scrutinise the findings is severely limited, thereby obstructing the assessment of their significance in the decision-making process.

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

and proximity of the proposal, as indicated by available summaries. These impacts are based on direct engagement with the community and are therefore not speculative. Furthermore, the proposal is seen as a direct threat to community identity and cohesion, with the developer's findings noting a "cultural loss." Despite the gravity of these issues, they have not been adequately incorporated into the main application or given the appropriate consideration they warrant.

The failure to publish the full Social Impact Assessment obscures the true human and social costs of the development, undermining the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when the character and functioning of the community may be affected. By withholding the complete dataset, the application fails to provide a robust evidential basis for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet existing adverse effects have not been fully disclosed in the available evidence. Consequently, without the complete assessment, adherence to this policy cannot be verified.

The procedural implications 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 omission constitutes a material flaw within the application and signifies a failure to meet the evidential standards required by the Environmental Impact Assessment framework. Overall, the combination of not disclosing the full Social Impact Assessment and the evidence of existing adverse impacts renders the evaluation incomplete and unreliable, hindering a lawful determination and reinforcing the conclusion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual and landscape impacts associated with the proposed development is significantly flawed and fails to capture the true scale of change and the sensitivity of the surrounding environment. The West Lewis coastline, characterised by its expansive Atlantic horizon, unspoiled nature, and profound sense of isolation, would be profoundly affected by the presence of large-scale turbines situated near the shore. Such an industrial presence would fundamentally transform this unique character, leading to an irreversible alteration of the landscape.

Moreover, the application inadequately reflects the extent of visual change that would ensue. The size and closeness of the turbines would dominate views from local residential areas, historically significant sites, and popular coastal spots. This intrusion would detract from visual amenity and compromise the cherished qualities of naturalness and remoteness. The assessment does not adequately communicate the significance of these impacts, particularly given the sensitivity of the landscape in

question.

Concerns regarding the methodology employed in selecting and presenting visual viewpoints are also evident. There is compelling evidence to suggest that the chosen viewpoints do not adequately capture the experience of the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impacts have been underestimated, thereby compromising the credibility of the assessment.

Additionally, the assessment fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a larger landscape that is visually and spatially connected to the Atlantic horizon. By treating these heritage assets as isolated features, the assessment overlooks their interdependencies, resulting in an incomplete understanding of the impacts on their settings and cultural significance.

The anticipated industrialisation of the seascape would disrupt these vital relationships, affecting how heritage assets are perceived and severing their ties to the natural horizon. This constitutes not just a visual disturbance but also a more extensive cultural and spatial detriment that has not been thoroughly evaluated within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 regarding the safeguarding of natural areas and historic assets. The scale of proposed change is at odds with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. The sheer scale, height, and proximity of the turbines guarantee a dominant and unavoidable presence. Thus, the anticipated changes are fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately convey the extent of impact, the sensitivity of the environment, and the intertwined relationship of landscape and heritage. These shortcomings inhibit a credible evaluation and reaffirm the position that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal's reliance on unspecified 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 could be adversely affected by sediment disturbance and contamination. The application has acknowledged various risks, including sediment mobilisation and accidental chemical or oil spills, yet it fails to provide adequate detail on the strategies needed to prevent,

control, or monitor these risks.

The assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate the likely environmental effects. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, but 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, which hinders any meaningful assessment of their adequacy or effectiveness.

There is considerable 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 consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats that are already recognised as sensitive within the wider assessment.

Moreover, the absence of detailed emergency response procedures intensifies these issues. By postponing contingency planning until after consent, the application fails to allow for evaluation of whether adequate safeguards are in place to address pollution incidents. This approach not only introduces procedural risk but also undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring essential environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be achieved. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In conclusion, the deficiencies in defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These shortcomings inhibit a thorough evaluation of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application fails to adequately assess the ecological and socio-economic impacts, raising immediate concerns about the protection and maintenance of these vital uses and habitats. A significant issue lies in the unfounded assumption that fishing activities can simply be displaced without repercussions. The absence of evidence regarding the availability, accessibility, and capacity of alternative fishing grounds is critical, as such displacement could lead to overfishing elsewhere and potentially threaten the livelihoods of the local fishing fleet.

The implications for fisheries and local economies cannot be properly understood without a thorough, evidence-based assessment.

Moreover, the proposal poses substantial risks to marine species, particularly due to underwater noise from construction activities. The anticipated high-energy hammer piling over a prolonged period is likely to disrupt a wide area, with notable effects on species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these impacts, lacking the necessary supporting evidence to justify this downplaying.

There exists a contradiction within the application: while it acknowledges the requirement for licences to permit harm to European Protected Species, it simultaneously describes these impacts as negligible. This inconsistency undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially given that anticipated harm might necessitate 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 an integrated evaluation of these combined effects, it remains impossible to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not satisfy the requirements of the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which hampers any conclusion regarding the proposal's sustainability.

In summary, the deficiencies regarding evidence of fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies severely undermine the assessment's completeness and reliability. These issues obstruct a thorough evaluation of the impacts on marine life and fisheries, necessitating immediate action to address these critical concerns.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is significantly incomplete and does not consider the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and the onshore works are closely connected, yet their assessment occurs in isolation. This leads to a fragmented approach, masking the true extent of both environmental and socio-economic consequences.

The onshore components encompass cabling that runs across protected moorland, the construction of a substation located near Stornoway, and the required access infrastructure through sensitive landscapes. These activities involve excavation across areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon

store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, which obstructs a complete understanding of the overall environmental footprint of the project.

By omitting or postponing the assessment of onshore impacts, the application precludes a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project are reviewed collectively; however, the disjointed assessment of offshore and onshore components leaves the combined impacts on peatlands, habitats, and local communities inadequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which receive policy protection. The application fails to show that impacts on these vital habitats have been fully evaluated or that suitable avoidance measures have been implemented. This reveals a substantial 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 present evidence that the requisite consents or processes have been initiated, which raises concerns about the feasibility and legality of the proposed implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is defined by its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and the burgeoning tourism sector, particularly astro-tourism. However, the proposal under consideration includes permanent red aviation lighting that would be visible over long distances, resulting in a continuous and intrusive “wall of light” effect across the western horizon. This would fundamentally disrupt the night-time environment, yet the assessment of dark skies and nocturnal wildlife is entirely absent from the Environmental Impact Assessment.

Significantly, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. The omission is particularly concerning given the vital role dark skies play in the area's identity. Furthermore, the lack of consideration for nocturnal wildlife is alarming. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel

are known to be sensitive to artificial lighting, which can lead to disorientation and an increased risk of collision. Without a lighting impact assessment or phototaxis study, the application does not address how aviation lighting might affect these species or contribute to increased mortality rates.

This issue is aggravated by an over-reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, which may forage or migrate at night, also face disorientation due to artificial lighting, yet this risk remains unassessed. The absence of site-specific night-time data creates a substantial gap in understanding ecological impacts.

Without an evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It further diminishes the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall landscape.

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

TOURISM

The application does not adequately assess the impacts of tourism, which is a crucial sector for the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Notably, 86% of visitors are attracted by the scenery, yet there is no quantified evaluation of how large-scale offshore infrastructure could potentially alter visitor numbers, their behaviour, or the overall economic contribution of tourism.

The tourism sector has seen substantial growth, with its value rising from £65 million in 2017 to over £81.5 million. This growth supports more than 1,000 jobs and constitutes up to 16% of the island's economy. Nevertheless, the application fails to model the impact that the industrialisation of the seascape and the consequent loss of environmental quality would have on Tourism Gross Value Added and the wider economic resilience. Without this critical analysis, it remains unclear whether the development would provide a net economic benefit or harm an established and expanding sector.

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies

for visitor experience and emerging sectors like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, leaving a considerable gap in understanding the impacts on this increasingly important part of the local economy.

In an island community that has limited economic diversification, the lack of an assessment of tourism impacts bears 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 properly evaluated, contrary to requirements set out under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially regarding economic impacts and the necessity to demonstrate net benefit. It also contradicts strategic objectives that identify tourism as a priority growth sector, failing to provide adequate evidence for the competent authority to assess the economic consequences of the proposal.

Collectively, these deficiencies in quantifying tourism impacts, analysing environmental factors influencing visitor behaviour, and considering the island's economic dependency create a substantial evidential gap. This situation hinders a thorough evaluation of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal 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

We live on the Isle of Lewis and often visit the west side.
My wife and I are horrified by this development, which in the long term will reflect very badly on its proponents: in particular any politicians who supported the project.
It will be a visible scar on the Outer Hebrides and Scottish historians will not forget those responsible.

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: 3C3D9003

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection stems from a thorough review of the Environmental Impact Assessment Report and associated documentation, revealing material deficiencies in planning, environmental considerations, cultural factors, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, scale, and proximity of the proposal raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The documentation fails to provide a sufficient evidential basis for a lawful determination. It is noted that critical environmental data is absent, baseline information is both limited and inconsistent, and essential details of the proposal remain undefined. The application employs a flexible design framework, which obscures an understanding of likely significant effects. Furthermore, the reliance on unspecified mitigation measures inhibits an assessment of their effectiveness. Consequently, the materials presented do not facilitate a comprehensive or informed understanding of potential environmental, cultural, or community impacts. Claims of negligible or non-significant effects lack robust evidence.

There are substantive conflicts with policy that must be acknowledged. The proposal 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. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such policy conflicts directly relate to the statutory tests required for consent and impede the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal raises alarm, particularly due to the large turbines being positioned in close proximity to the shoreline. This raises substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Together, the lack of adequate information, dependence on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species presents significant deficiencies and fails to deliver a comprehensive understanding of ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the baseline data remains incomplete. The methodologies used do not adequately capture the presence, behaviour, and habitat use of various species.

Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

One critical shortfall is the treatment of otters, which are a European Protected Species. The application does not appropriately acknowledge or assess their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of potential effects from construction disturbances, noise, and increased activity. This gap undermines the conclusions concerning the absence of significant effects on this species.

There are also substantial shortcomings in the assessment of basking sharks, particularly due to the reliance on aerial surveys that introduce significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that show frequent use of these waters. The failure to include or properly consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

The methodological weaknesses mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the real 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, given that protected species have not been properly identified or evaluated. The uncertainties introduced hinder the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, granting consent cannot be legally justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presented is fundamentally flawed, containing significant gaps in evidence and internal contradictions that undermine its conclusions. It has been identified that the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be adversely affected. The development is situated within crucial foraging areas and migratory routes, yet the assessment does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

A major inconsistency arises within the application itself, as the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. The assessment does not sufficiently confirm that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not adequately considered, and the dependence on modelling approaches introduces a level of uncertainty, particularly concerning species facing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain insufficiently understood.

The location of turbines within a recognised migratory corridor adds another significant risk, effectively posing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to adequately assess the long-term consequences of ongoing mortality within this corridor or the potential impact on species with relatively small global populations.

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are intrinsically connected. However, the assessment of cultural heritage and community identity within the application is fundamentally inadequate. It adopts a reductive approach, treating heritage as isolated and static assets without acknowledging their ongoing social, cultural, and spiritual functions within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These are active burial sites and places of

spiritual practice, yet they are categorised in the assessment as static features. This failure to consider their continued use and meaning, along with the potential impact of development on their settings, leads to an incomplete evaluation of cultural effects and disregards their importance in community life.

Furthermore, the application neglects to assess intangible cultural heritage, including the Gaelic language and traditions that define the community's long-standing relationship with the coastal environment. These elements are central to the area's identity but are entirely overlooked in the assessment, creating a significant omission that hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its distinct cultural identity recognised as characteristic of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The lack of this assessment means that the competent authority cannot meet its legal duty to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

These deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to recognise living cultural practices, represents a clear departure from policy requirements.

Collectively, the failure to adequately assess living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The cultural impacts of the development remain unassessed, and the application does not provide a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal lacks a complete assessment of social impacts, health, and wellbeing. The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report has not been published. This omission creates a significant gap in evidence and hinders both public understanding and the competent authority's ability to grasp the full extent of social risks identified in the developer's research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement with the community and are not speculative. Nonetheless, the failure to disclose the

complete assessment restricts proper scrutiny of these findings and limits the determination of their significance in the decision-making process.

Moreover, the proposal is seen as a direct threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, these effects have not been adequately incorporated into the main application, nor have they been given appropriate weight. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is critical for developments of this magnitude, especially where community character and functioning may be affected. By not providing the complete dataset, the application fails to offer a robust evidential basis to evaluate the balance between benefits and harms.

From a policy standpoint, the application does not show compliance with National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the available evidence points to existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be established.

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

In summary, the non-disclosure of the complete Social Impact Assessment, paired with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This situation obstructs a lawful determination and supports the conclusion that the application does not possess sufficient information.

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 West Lewis coastline is characterised by clean coastal waters and important habitats that are particularly sensitive to sediment disturbance and contamination. The application acknowledges the presence of risks such as sediment mobilisation and accidental chemical or oil spills; however, it lacks sufficient detail on preventative,

control, or monitoring measures for these risks. The assessment of construction and pollution risks associated with the proposal is incomplete, failing to provide the necessary detail to evaluate the likely environmental effects adequately.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that will be formulated post-consent, which undermines any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures raises significant concerns given the sensitivity of the receiving environment.

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, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the ability to evaluate whether appropriate safeguards are in place to address pollution events. Such a deferral introduces procedural risk and undermines the capability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the failure to provide critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed before consent is granted; without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts renders the assessment materially deficient. These shortcomings significantly hinder a robust evaluation of construction and pollution risks and further support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal presents significant risks to marine species, particularly due to the underwater noise created during construction. The anticipated high-energy hammer piling over an extended duration is likely to disturb marine life across large areas, notably impacting local populations of dolphins. The potential disturbance to a considerable segment of the bottlenose dolphin population is a major concern; however, the application fails to adequately address the severity of these effects and

lacks sufficient supporting evidence.

In addition to the risks to marine species, the application inadequately assesses the implications for fisheries and marine life, providing a poor evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a vital fishing industry, yet the application does not demonstrate how these habitats and uses can be preserved or maintained without causing significant disruption.

A crucial flaw in the application is the assumption that fishing activities can be relocated without any negative consequences. The proposal lacks evidence to confirm that alternative fishing grounds are available and viable for supporting the additional pressure from displaced activities. This significant omission raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Furthermore, the assessment fails to adequately address cumulative impacts that may arise from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. The inability to evaluate these combined effects inhibits a full understanding of the overall impact on marine ecosystems and socio-economic conditions.

The application also shows a notable inconsistency regarding the need for licenses to permit harm to European Protected Species while simultaneously claiming that impacts are negligible. This contradiction seriously undermines the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

From a policy standpoint, the application does not prove compliance with the National Planning Framework 4 or the National Marine Plan. It fails to illustrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal is sustainable.

Overall, the lack of substantiated evidence concerning fishing displacement, the minimisation of acoustic impacts, and the inconsistencies throughout the assessment render it incomplete and unreliable. These shortcomings hinder the ability to conduct a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The examination of onshore infrastructure is significantly lacking and does not adequately account for the comprehensive impacts stemming from what constitutes a singular, integrated project. The connection between offshore turbines and onshore works is critical, yet these elements are evaluated in isolation. This fragmented assessment clouds the true magnitude of the environmental and socio-economic

ramifications.

Onshore activities encompass cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through delicate landscapes. These undertakings necessitate excavation in areas of deep peat, particularly within Barvas Moor, which is not only a vital carbon sink but also an ecologically sensitive area. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

The omission or postponement of onshore impact evaluations obstructs an accurate appraisal of cumulative effects. The Environmental Impact Assessment process mandates that all facets of a project be considered in conjunction. However, the distinct treatment of offshore and onshore components obscures the collective impacts on peatlands, habitats, and local communities, leaving these critical aspects inadequately understood.

Moreover, there are significant threats to vulnerable habitats, such as machair systems and peatland environments, which hold policy protection. The application does not convincingly demonstrate that the consequences for these habitats have been thoroughly evaluated or that suitable avoidance strategies have been enacted. This results in a notable evidential void concerning biodiversity preservation.

Concerns regarding carbon balance are also prominent. Disturbance of peatland results in the release of stored carbon, which may instigate a carbon debt, undermining the very objectives of renewable energy initiatives. The application lacks sufficient analysis of this matter or fails to show that the overall carbon balance is favourable.

Additionally, the routing of infrastructure through active croft land creates potential conflicts with current land use and legal rights. There is no evidence provided that the requisite consents or procedures have been initiated, leading to doubts about the feasibility and lawful execution of the proposal.

From a policy standpoint, the failure to evaluate the project in its entirety and to demonstrate safeguarding of peatlands, habitats, and land use concerns is at odds with the National Marine Plan and National Planning Framework 4. The inability to prove that adverse impacts can be avoided or mitigated further diminishes the application's credibility.

Ultimately, the disjointed treatment of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts render this portion of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive "wall of light" effect across the western horizon. This development fundamentally alters the night-time environment of the West Lewis coastline, which is known for its exceptionally dark skies. Dark skies are essential to the area's environmental quality, cultural identity, and tourism value.

Crucially, there has been no assessment of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. The omission is particularly concerning given the rising significance of dark skies to local identity and the burgeoning tourism sectors such as astro-tourism. The lack of consideration for these impacts reveals a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially vulnerable to artificial lighting because of phototaxis, which can result in disorientation and an increased risk of collision. The application lacks a lighting impact assessment or a phototaxis study, failing to evaluate how the aviation lighting may adversely affect these species or contribute to mortality rates.

This oversight is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which neglects to account for nocturnal activities and related risks. Species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this danger has not been assessed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

Moreover, from a policy perspective, these omissions contradict the National Planning Framework 4 concerning the protection of natural places and environmental quality. This gap also undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is a vital component of the overall ecosystem.

In summary, the failure to assess dark skies and nocturnal wildlife creates a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis means that the application is incomplete and cannot lawfully support a determination.

TOURISM

The assessment of tourism impacts associated with the proposed development is significantly lacking, failing to adequately evaluate the economic and social

repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has experienced considerable growth, with revenue increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. Nonetheless, the application falls short by failing to model the potential impacts of industrialising the seascape and the resultant loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Furthermore, the assessment neglects to consider the critical role of environmental quality in enhancing the tourism experience, particularly the value of unspoiled landscapes and dark skies to visitors, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to examine the implications for tourism raises broader concerns regarding employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposed development.

Collectively, the failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependency result in a notable evidential gap. This lack of comprehensive evaluation undermines the ability to draw robust conclusions about the economic effects of the proposal and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the essential criteria for sustainable development when evaluated against legal obligations, national policy, and evidence requirements. It revisits the fundamental concerns that led to the rejection of the Lewis Wind Power proposal in

2008, where the level of industrialisation was deemed unacceptable. Now, this proposal is being considered under a more robust policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There exists a lack of a complete and dependable evidential foundation for making a determination. Critical deficiencies in baseline data are evident, compounded by the ongoing use of an undefined design envelope and an over-reliance on unspecified mitigation measures. Key impact pathways have been omitted, including those concerning nocturnal wildlife, the full scope of onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate and fails to provide a comprehensive understanding of the probable significant effects or residual impacts.

Further complicating matters are clear procedural shortcomings. The omission of a compliant Island Communities Impact Assessment is a violation of the statutory duty under the Islands (Scotland) Act 2018, and the lack of disclosure regarding the complete Social Impact Assessment constitutes a significant omission. These gaps obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal stands in direct opposition to National Planning Framework 4. It does not demonstrate the necessary protection of biodiversity, natural environments, and cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. Additionally, it fails to provide evidence of a net economic benefit, as there is no tourism impact modelling available. The cumulative effects of both offshore and onshore components have not been adequately assessed, clouding the understanding of impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks remain significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The evidential threshold required to confidently exclude adverse effects has not been achieved, necessitating the application of the precautionary principle and precluding a lawful determination that impacts are acceptable.

Moreover, 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, the disruption of cultural and visual connections, and the negative impacts on tourism represent permanent changes that cannot be mitigated effectively.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent based on these grounds or invoke the relevant regulatory provisions to compel the

submission of the outstanding information.

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

Additional Comments

Objections to the proposed Spiorad na Mara offshore wind farm off the west coast of the Isle of Lewis

Industrialization of a wild landscape with 380m+ high turbines located a mere 5-13km offshore. The negative impacts on the sea biodiversity through noise, vibration, shadows, and microplastics from erosion on the blades. The disruption and disturbance to the sea bed and the damage to sea life who use ultrasound to navigate, feed, and mate. The noise, interference and damage to marine life have not been adequately and fully investigated in the development proposal. Not only disruption to marine mammals, but also seabird colonies with the huge rotating blades, along with interference to their navigation.

The off shore windfarm is a significant threat to tourism, and local heritage. Concerns include light pollution, noise, and visual impacts from key viewpoints. Tourists come for the unspoilt wide open spaces and views and with that greatly reduced by the turbines would impact local businesses reliant on tourism. With the monstrous 380m turbines (1,246ft) so close to the coast the wild character of the landscape and would reduce tourism. Flashing aviation lights on the turbines could destroy the "Dark Sky" status of West Lewis.

We have a number of turbines on the island already and they are more idle than turning, which the owners of the windfarms are paid enormous amounts to stop turning, the cost of which is then passed to the consumer. As islanders we will get all the negatives and no benefits, and as fuel poverty is highest on the islands than anywhere else in the UK, these turbines do nothing for us, our environment or the biodiversity.

The Calanais Stones are one of the most significant stone circles, older than Stonehenge, and a huge draw for tourists and artists, will be negatively impacted by the visibility of the turbines from historic site.

The negative environmental impacts to the surrounding areas of turbines once they are decommissioned have been proven to last decades upon decades, these monstrous turbines will continue to negatively impact our children and grandchildren.

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: 1CC9AA2D

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a thorough review of the Environmental Impact Assessment Report and its supporting documents, revealing significant planning, environmental, cultural, and procedural deficiencies.

The development's location off the west side of the Isle of Lewis is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposed development, which call into question its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined. The use of a flexible design framework obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures leaves their effectiveness unassessable. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Furthermore, the proposal exhibits clear and substantive conflicts with existing policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural places, cultural heritage, and health and wellbeing. There is insufficient demonstration that it meets national requirements to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent, undermining the competent authority's ability to deem the development acceptable under policy considerations.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a comprehensive, transparent, or trustworthy overview of the potential environmental repercussions of the proposal. The employment of a flexible Project Design Envelope, which lacks a commitment to precise turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hampers a consistent assessment based on worst-case scenarios, thereby compromising the integrity of the evaluation. As a result, the potential impacts outlined may not accurately represent the development that will ultimately be realised, leaving both the public and the competent authority unaware of the true magnitude of the environmental effects.

The application leans significantly on mitigation strategies, monitoring plans, and management approaches that remain undefined. Consent is being sought under the assumption that any environmental damage will be addressed later, which hinders any substantial evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally unacceptable and contradicts the essential aims of the Environmental Impact Assessment process, which mandates that significant potential effects and mitigation measures should be clearly established before any determination can be made.

There are also marked evidential shortcomings, encompassing gaps in baseline data, methodological limitations, and a reliance on assumptions rather than specific site-related evidence. This leads to uncertainties regarding both the scale and significance of the impacts, particularly where conclusions suggest negligible or non-significant effects without robust supporting information. The lack of adequate data obstructs a clear comprehension of cumulative and worst-case impacts, introducing scientific uncertainties that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential standards outlined in 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. Furthermore, the proposal falls short of demonstrating alignment with the National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not possible to confirm that impacts have been thoroughly evaluated or that suitable safeguards have been established.

Overall, the dependence on an unspecified design envelope, the lack of defined mitigation strategies, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies prevent a lawful and rigorous assessment of environmental effects, resulting in the competent authority being unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The proposed development fails to adequately assess alternatives, which does not align with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of feasible alternatives based on their environmental impacts, the application presents a narrative of the project's evolution. This method does not sufficiently show that the developer has identified, assessed, and chosen less harmful options over more damaging ones.

A notable lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations exists. Specifically, the application does not indicate that the developer has thoroughly considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline, as well as the significance of proximity to shore in assessing impact, this lack of analysis hinders the ability to conclude that the proposed siting is the least damaging option.

Moreover, the shortcomings are evident in the assessments of cable routing and landfall, where there is inadequate evidence to suggest that alternative routes have been properly examined to avoid or lessen effects on sensitive receptors. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis illustrate that mitigation by design has not been incorporated, leading to an overreliance 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 indicates a failure to adhere to the established mitigation hierarchy, which obstructs the competent authority's ability to ascertain whether more suitable and less harmful alternatives exist. Without a thorough alternatives assessment, it cannot be established that the proposal represents a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies detract from compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that leads to the conclusion that the application has not undergone sufficient evaluation and cannot justifiably support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species reveals significant deficiencies that undermine its reliability and effectiveness. This coastal environment of West Lewis is particularly sensitive and biologically rich, yet the baseline data presented is inadequate. The methodologies used fail to comprehensively capture the presence, behaviour, and habitat usage of key species. Consequently, this shortfall renders any assessment of impacts to be speculative rather than grounded in solid evidence.

Otters, classified as a European Protected Species, are notably overlooked in this assessment. The application neglects to properly evaluate their active foraging and movement patterns along the coast. The absence of an assessment of their core foraging range means that potential disturbances from construction activities, noise, and increased human presence have not been sufficiently evaluated. This oversight fundamentally weakens any claims made regarding the lack of significant effects on otters.

In addition, the evaluation of basking sharks suffers from methodological flaws. The reliance on aerial surveys, particularly in challenging Atlantic weather conditions, introduces a significant bias in detection rates. This approach is likely to underestimate the actual presence of basking sharks in the area, especially when juxtaposed with established land-based observations that highlight their frequent utilisation of these waters. Such omissions further compromise the baseline data and diminish the credibility of the conclusions drawn.

The inadequacies in methodology result in conclusions of negligible or non-significant effects that are more reliant on assumptions than on robust scientific evidence. Furthermore, the lack of adequate baseline data hampers the ability to assess cumulative and indirect impacts, seasonal variations, and interactions within the wider ecosystem. This creates a substantial degree of uncertainty regarding the real risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the obligations set out in the Environmental Impact Assessment regime and National Planning Framework 4. The failure to appropriately identify and assess protected species leads to heightened uncertainty, making it impossible to exclude adverse effects beyond reasonable scientific doubt. The application thus engages the precautionary principle, indicating that consent cannot be granted lawfully.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A major contradiction is evident, as the developer asserts that there are no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that the conclusions are not backed by the necessary evidence. The assessment lacks sufficient evidence to confirm that seabirds associated with protected sites like the Lewis Peatlands and St Kilda will remain unaffected. The importance of these feeding grounds is not thoroughly addressed, and the reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed may underestimate mortality, especially given the incomplete baseline data and lack of understanding of behavioural responses.

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

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

Furthermore, the deficiencies noted 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 be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is deemed unreliable due to internal inconsistency, methodological weaknesses, and a 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 essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally flawed, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, traditions, and community are deeply intertwined. The approach taken by the application is reductive, viewing heritage merely as isolated and static assets, rather than understanding their ongoing social, cultural, and spiritual relevance to the community.

A significant shortcoming is evident in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment classifies them as

unchanging features, failing to acknowledge their continued significance and the potential impact of development on their surroundings. This mischaracterisation leads to an incomplete cultural evaluation and overlooks their vital role in community life.

Moreover, the application does not take into account intangible cultural heritage, which includes the Gaelic language, traditions, and the enduring relationship between the community and its coastal environment. These aspects are essential to the area's identity, yet they are conspicuously absent from the assessment, highlighting a critical omission. Without addressing these components, the cultural implications of the development cannot be comprehensively understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population embodies a unique cultural identity, with traits characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent undertaken. This lack of meaningful engagement undermines the assessment's validity and fails to adhere to established principles for participation in decisions that impact cultural and environmental interests.

A crucial procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to meet its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings put the proposal at odds with the National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect to consider both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear divergence from policy requirements.

In summary, the lack of assessment of living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The cultural ramifications of the development have not been adequately assessed, leading to the conclusion that the application does not offer a sufficient foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment represents a critical flaw in the evaluation process. The developer has conducted focus groups with local residents; however, the full report remains unpublished. This omission creates a significant evidential gap that hinders both public understanding and the competent authority's ability to assess the potential social risks identified in the developer's own research.

Summaries that are available reveal that local residents are already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed

development. These impacts are based on direct engagement and are not merely speculative in nature. Nevertheless, without access to the complete assessment, proper scrutiny of these findings is compromised, limiting the opportunity to evaluate their significance in the decision-making process.

Moreover, the proposal has been perceived as a direct threat to community identity and cohesion, with the developer's own findings indicating a concern for "cultural loss." However, these serious impacts have not been adequately incorporated into the main application or given the necessary weight in the evaluation process. The withholding of the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency in transparency has broader 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. The failure to provide the complete dataset limits the application's ability to present a thorough evidential basis for weighing benefits against potential harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to foster positive health outcomes and mitigate harm. However, the evidence suggests that adverse effects already exist and have not been fully disclosed. Without the full assessment, it is impossible to demonstrate adherence to this policy.

The procedural consequences are considerable. The competent authority is unable to perform a rigorous socio-economic and health evaluation without access to the full Social Impact Assessment. This constitutes a material omission within the application and signifies a failure to meet the evidential standards set by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation inhibits 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 strong sense of remoteness. The application for large-scale turbines in close proximity to the shoreline would introduce a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient and does not sufficiently represent the scale of change or the sensitivity of the receiving environment.

There are significant concerns regarding the methodology employed in the selection

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

The application also fails to examine the interconnected relationships between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape setting linked to the Atlantic horizon. The assessment treats these sites as isolated entities without acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

Furthermore, the industrialisation of the seascape would disrupt these relationships and alter the context in which heritage assets are experienced. This not only represents a visual impact but also entails broader cultural and spatial harm that has not been sufficiently evaluated within the application.

From a policy perspective, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is incompatible with safeguarding landscape character, visual amenity, and the setting of culturally significant sites. The absence of a robust worst-case assessment further weakens the claim of compliance with policy requirements.

Finally, it is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their dominant presence, making any change fundamentally permanent rather than reducible to an acceptable level through mitigation. Collectively, these deficiencies highlight the failure to accurately represent the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage, reinforcing the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks presented in this application is significantly lacking and fails to deliver the necessary detail for a thorough assessment of potential environmental impacts. Involvement in extensive seabed preparation and installation activities in a high-energy Atlantic setting is proposed, yet there are no well-defined Construction Environmental Management Plans or Pollution Prevention Plans in place. Instead, the application leans on mitigation and contingency strategies that are intended to be formulated after consent has been granted, inhibiting a genuine appraisal of their potential effectiveness or adequacy.

This dependency on unspecified future measures is particularly alarming, considering the delicate nature of the receiving environment. The coastline of West Lewis is home to clean coastal waters and crucial habitats that are sensitive to disturbances from sediment and contamination. Although the application acknowledges risks associated

with sediment mobilisation and accidental chemical or oil spills, it fails to provide ample detail on preventative, control, or monitoring strategies.

There is also considerable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without comprehensive modelling and clearly established management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also encompasses potential effects on marine species and habitats recognised as sensitive within the broader assessment framework.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application obstructs the ability to evaluate whether adequate safeguards are in place to manage pollution incidents. This creates procedural risks and diminishes the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment framework. Significant effects and mitigation must be evaluated before consent can be granted, and in the absence of this information, a lawful determination is unattainable. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation strategies, the absence of detailed management plans, and the uncertainty surrounding potential impacts culminate in a materially deficient assessment. These deficiencies hinder a comprehensive evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

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

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The extensive use of

high-energy hammer piling is likely to create disturbances over vast distances, impacting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is concerning, yet the application downplays these effects without adequate supporting evidence.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves infrastructure linked to offshore turbines and onshore works, which are not assessed as a single integrated project. This approach results in a fragmented evaluation that obscures the comprehensive environmental and socio-economic impacts of the development. Onshore components, including cabling across protected moorland, a substation construction near Stornoway, and the necessary access infrastructure, are significant in their implications, particularly as they involve excavation in deep peat areas like Barvas Moor. This region serves as a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts limits understanding of the project's complete environmental footprint.

Furthermore, by not properly evaluating onshore impacts, the application hinders the assessment of cumulative effects that arise when all project elements are considered together. The Environmental Impact Assessment mandates that both offshore and onshore aspects be viewed in conjunction, yet their separation leads to an incomplete understanding of the combined effects on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, such as machair systems and

peatland environments, which are protected under policy. The application fails to establish that all impacts on these areas have been fully assessed or that suitable avoidance measures have been taken. This creates a significant evidential gap concerning biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not present evidence that necessary consents or processes have been initiated, which brings into question the feasibility and legality of the proposal.

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

Overall, the separation of the project components, the absence of comprehensive assessment, and the lack of evidence regarding environmental and land use impacts contribute to rendering this aspect of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The application lacks an assessment of dark skies and nocturnal wildlife, which is a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, an essential part of its environmental quality, cultural identity, and tourism potential. The proposal plans to introduce permanent red aviation lighting that will be visible over long distances. This lighting will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The proposal fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This is especially concerning given the importance of dark skies to the area's identity and emerging tourism sectors, such as astro-tourism. The lack of consideration of these impacts creates a gap in the overall assessment of the landscape and environment.

More importantly, there is no analysis of the effects on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting because it can cause disorientation and increase the risk of collision. The application does not provide a lighting impact assessment or a study on phototaxis, failing to evaluate how aviation lighting might impact these species or contribute to higher mortality rates.

This lack of assessment is further exacerbated by the dependence on daytime survey data in the ornithological evaluation, which fails to account for nocturnal activity or related risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this risk has not been evaluated. The

absence of site-specific night-time data represents a critical gap in understanding the ecological consequences.

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

From a policy standpoint, this omission contradicts the National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also weakens the broader assessment of landscape and seascape impacts, as the character of the night-time environment is an integral element of the ecosystem.

Overall, the failure to assess dark skies and nocturnal wildlife creates a significant evidential gap. The lack of baseline data, impact modelling, and specific analysis of species renders the application incomplete and incapable of supporting a lawful determination.

TOURISM

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

Tourism has experienced significant growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not examine how the industrialisation of the seascape and degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such critical analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

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

In a context where the island community faces limited economic diversification, this neglect to assess the impacts on tourism has broader implications for employment,

local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment means that these economic vulnerabilities have gone unexamined, contravening requirements set out in the Islands (Scotland) Act 2018.

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

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal presents a significant inadequacy in fulfilling the criteria for sustainable development, particularly when evaluated against statutory obligations, national policies, and required evidential standards. It echoes the principal concerns that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed excessively industrialised. This current application emerges under a policy framework that has been strengthened, placing enhanced emphasis on biodiversity, peatland preservation, landscape integrity, and community welfare.

A critical issue with the application lies in its failure to provide a comprehensive and dependable evidential foundation for decision-making. There are notable deficiencies in baseline data, the ongoing use of a vague design envelope, an over-reliance on unspecified mitigation measures, and the exclusion of important impact pathways affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate and does not facilitate a thorough understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal stands in direct opposition to the principles outlined in National Planning Framework 4. It fails to demonstrate the necessary protection of biodiversity, natural habitats, and cultural heritage, does not sufficiently address health and wellbeing impacts, and lacks evidence of a net economic benefit, largely due to the absence of

tourism impact analysis. Furthermore, the cumulative impact of both offshore and onshore components has not been adequately assessed, thus obscuring potential effects on peatlands, carbon balance, habitats, and agricultural land.

The environmental risks associated with this proposal remain ambiguous and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain areas, contradictory. The evidential standard required to dismiss adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and obstructing a lawful determination that impacts are acceptable.

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

In summary, the application is procedurally and substantively unfit for determination. The extent of information shortfalls, alongside conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, the competent authority is urged to refuse consent based on these grounds or to apply the relevant regulatory provisions to mandate the submission of the necessary missing information.

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

Additional Comments

Scotland generates all the renewable power it needs. This is just greed and its UTTERLY inappropriate for this beautiful landscape and rare ecosystem. We have had enough of this endless industrialisation of our land.

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: D21D4391

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which is submitted under marine licensing and Environmental Impact Assessment rules. The proposal is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the project, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a solid evidential basis for a lawful decision. There is a notable absence of critical environmental data, while baseline information is limited and inconsistent. Many key aspects of the proposal remain undefined, and the use of a flexible design framework obscures an understanding of potential significant effects. Furthermore, relying 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, with claims of negligible effects lacking robust support.

There are significant conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that the national requirements to safeguard biodiversity and environmental integrity will be fulfilled. These discrepancies directly relate to the statutory requirements for consent and impair the competent authority's ability to determine the project's acceptability in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact due to the large turbines being situated close to the shoreline. Overall, the lack of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to significant deficiencies in the Environmental Impact Assessment Report, which fails to provide a comprehensive and reliable account of the potential environmental effects associated with the proposal. The adoption of a flexible Project Design Envelope, lacking definitive turbine

dimensions and configurations, creates considerable uncertainty and undermines the ability to apply a worst-case scenario consistently. This deficiency compromises the integrity of the assessment, resulting in impacts that may not accurately represent the final development, thereby obstructing the public and the competent authority from grasping the true environmental consequences.

Moreover, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be addressed later hampers any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's intent, which necessitates that significant effects and mitigation measures are explicitly established before determination.

There are substantial evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Consequently, there is ambiguity surrounding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects lack robust supporting data. The inadequacy of information hinders a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is not reconcilable with statutory obligations.

Consequently, the application does not satisfy the evidential threshold 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 does not demonstrate adherence to National Planning Framework 4, which encompasses requirements for biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that adequate safeguards are implemented.

Collectively, the dependence on an ambiguous design envelope, the lack of specified mitigation measures, and the deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings obstruct a lawful and thorough evaluation of environmental effects, placing the competent authority in a position where it cannot adequately determine the application based on the information available.

ASSESSMENT OF ALTERNATIVES

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

There is a significant lack of transparent or evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered positioning turbines further offshore, which could potentially reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical importance of proximity to shore in determining impact highlight that the absence of such an analysis obstructs any conclusion about whether the proposed siting is the least damaging option available.

Deficiencies are evident in the assessment of cable routing and landfall, as well, where insufficient evidence indicates that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that mitigation by design has not been implemented, resulting in an overreliance on post-design mitigation measures.

As a result of these shortcomings, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy inhibits the competent authority's ability to ascertain whether there are less harmful and more appropriate alternatives. Without a comprehensive assessment of alternatives, the proposal cannot be deemed a sustainable or policy-compliant solution.

From a policy perspective, these inadequacies jeopardise compliance with National Planning Framework 4, especially concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that significantly contributes to the conclusion that the application has not been adequately assessed, preventing lawful determination.

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 assessment of the proposed development is fundamentally flawed, exhibiting significant evidence gaps and internal contradictions that cast doubt on its conclusions. It is situated in an area of the west coast of the Isle of Lewis that is critical for internationally important seabird populations, many of which are already experiencing declines. The application does not adequately demonstrate that these species will not be adversely affected, despite their presence in key foraging areas and migratory routes. There is a lack of robust evaluation regarding displacement, collision risk, or habitat loss associated with the development.

Notably, a contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment fails to substantiate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is not sufficiently

acknowledged, and the reliance on modelling creates uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces another significant risk, effectively acting as a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion that would support the granting of consent. Additionally, these deficiencies demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In conclusion, the assessment's reliability is undermined by internal inconsistencies, methodological inadequacies, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements needed for a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

development.

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The social impacts, health, and wellbeing related to the proposed development have not been adequately assessed, revealing a lack of transparency that is crucial for a lawful evaluation. Although the developer conducted a Social Impact Assessment which involved focus groups with local residents, the full report remains unpublished. This absence creates a significant evidential gap that obstructs both public understanding and the competent authority's ability to grasp the full scope of social risks identified through the developer's own research.

Residents are currently facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposal, as indicated by available summaries. These impacts are based on actual engagement rather than speculation. However, the failure to release the complete assessment hampers thorough examination of these findings and restricts the assessment of their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal threatens community identity and cohesion, with the developer's own findings noting a risk of "cultural loss." Nonetheless, these social impacts have not been adequately incorporated into the main application nor given the necessary consideration. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of transparency significantly undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health effects is vital for developments of this magnitude, especially when community character and functioning could be at stake. Without the complete dataset, the application does not provide a thorough evidential foundation for evaluating the balance between benefits and harm.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals are expected to foster positive health outcomes and avoid harm; however, available evidence suggests existing negative effects that have not been fully revealed. Consequently, without the complete assessment, compliance with this policy remains unproven.

The procedural consequences are considerable. The competent authority is unable to perform a robust evaluation of socio-economic and health implications due to the unavailability of the full Social Impact Assessment. This represents a significant omission within the application and a failure to fulfil the evidential requirements mandated by the Environmental Impact Assessment process.

In summary, the non-disclosure of the full Social Impact Assessment, alongside the evidence of ongoing adverse impacts, renders the evaluation incomplete and unreliable. 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 on the seascape, landscape, and cultural heritage is fundamentally inadequate and does not sufficiently convey the extent of change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed installation of large-scale turbines near the shoreline would introduce a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to accurately represent the scale of visual change expected. The size and proximity of the turbines would dominate views from nearby residential areas, historic sites, and frequently visited coastal locations, directly impacting visual amenity while eroding the defining qualities of naturalness and remoteness. The assessment does not adequately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning significant cultural heritage sites and high-value landscapes. This presents a risk that

the extent of visual impact has been underestimated, which undermines the assessment's reliability.

Furthermore, the assessment neglects the interconnected relationships between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape context that is visually and spatially linked to the Atlantic horizon. By treating these assets as isolated, the assessment fails to acknowledge their interdependence, leading to an incomplete evaluation of the 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 severing their connection to the natural horizon. This results not only in a visual impact but also represents a wider cultural and spatial detriment that has not been thoroughly assessed in the proposal.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4, which seeks to protect natural environments and historic assets. The proposed scale of change is at odds with the requirements to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visual presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, rather than amenable to reduction through mitigation measures.

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings impede a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. The current proposal entails substantial seabed preparation and installation works within a high-energy Atlantic environment; however, the assessment of construction and pollution risks is incomplete and lacks the necessary detail to evaluate potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided in the application, which instead relies on mitigation and contingency measures that are to be prepared post-consent. This reliance on undefined future measures raises significant concerns regarding the sensitivity of the receiving environment.

The application does acknowledge risks such as sediment mobilisation and accidental

chemical or oil spills but fails to deliver adequate information 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. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts, which include potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs any evaluation of whether suitable safeguards are in place to address pollution events. This introduces procedural risk and undermines 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 requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are assessed before consent; the omission of such information renders a lawful determination unfeasible. Additionally, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding the routing of infrastructure through active croft land, which may conflict with existing land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, leading to questions about the deliverability and lawful implementation of the project.

Moreover, the assessment of the project's onshore infrastructure is materially incomplete, neglecting to consider the full extent of impacts arising from what is a single integrated project. The offshore turbines and onshore works are intrinsically linked, yet they are assessed separately. This fragmented approach obscures the true scale of environmental and socio-economic effects.

Key onshore elements involve cabling across protected moorland and the construction of a substation near Stornoway, along with associated access infrastructure that traverses sensitive landscapes. Notably, these works require excavation across areas of deep peat, especially within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to provide a comprehensive assessment of these impacts, inhibiting a full understanding of the project's overall environmental footprint.

The exclusion or deferral of onshore impact assessments prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are considered collectively. However, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and communities are not fully understood.

Furthermore, there are significant risks to sensitive habitats, such as machair systems and peatland environments, which are subject to policy protection. The application does not demonstrate that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, resulting in a clear evidential gap concerning biodiversity protection.

Additionally, the proposal raises concerns about carbon balance. Disturbing peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this matter or prove that the overall carbon balance remains favourable.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism value. However, the Environmental Impact Assessment fails to consider the assessment of dark skies and nocturnal wildlife, representing a significant omission. The proposed installation of permanent red aviation lighting would be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally disrupt the night-time environment.

Moreover, the application neglects to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Given the significance of dark skies to the region's identity and its emerging tourism sectors, such as astro-tourism, this omission is particularly concerning. The lack of consideration for these effects leaves a clear gap in the landscape and environmental assessment.

More importantly, there has been no evaluation of the effects on nocturnal wildlife.

Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The application does not provide any lighting impact assessment or phototaxis study, failing to address how the proposed aviation lighting may influence these species or raise mortality rates.

The situation is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not account for nocturnal activity or the associated risks. Additionally, species such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may 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.

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

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

TOURISM

The evaluation of tourism impacts within the application is inadequate, neglecting to address the economic and social ramifications for a critical component of the Isle of Lewis economy. The island's tourism sector relies heavily on its scenic coastline, largely untouched landscapes, dark skies, and a sense of isolation. While the application notes that 86% of visitors are attracted by the scenery, it lacks a detailed quantitative analysis of how extensive offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has experienced substantial growth, with revenue rising from £65 million in 2017 to over £81.5 million, facilitating more than 1,000 jobs and representing up to 16% of the island's economy. Despite this progress, the application fails to explore how the potential industrialisation of the seascape and deterioration of environmental quality could affect Tourism Gross Value Added and the broader economic resilience. Without such an evaluation, it remains unclear if the development would yield a net economic benefit or jeopardise a vital and expanding sector.

Moreover, the analysis does not consider the significance of environmental quality in bolstering tourism, particularly the value of pristine landscapes and dark skies for visitor experiences. This oversight, compounded by the absence of a Dark Skies Assessment, creates a notable gap in understanding the impact on an increasingly important segment of the local economy, including emerging markets like nature-based tourism and astro-tourism.

For an island community that exhibits limited economic diversification, the neglect of tourism impacts carries broader implications for employment, local enterprises, and the sustainability of the community. The failure to conduct a proper Island Communities Impact Assessment means that these economic vulnerabilities have not been assessed in accordance with the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not substantiate compliance with National Planning Framework 4, especially regarding economic impact and the necessity to illustrate net benefit. Furthermore, it contradicts strategic objectives that designate tourism as a priority growth sector, lacking the necessary evidence for the competent authority to properly evaluate the economic ramifications of the proposal.

In summary, the deficiencies in quantifying tourism impacts, assessing the environmental influences on visitor behaviour, and acknowledging the island's economic dependency create a significant evidential shortfall. This situation hinders a thorough appraisal of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its failure to meet the requirements of sustainable development, as assessed against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Now, despite being put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it falls short of the necessary standards.

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

Procedural shortcomings are evident throughout the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties set forth

in the Islands (Scotland) Act 2018. Furthermore, the omission of the full Social Impact Assessment constitutes a material failure. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

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

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

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

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

Additional Comments

This huge development that is so close to the shores of our island, the Isle of Lewis threatens so much of our way of life. These will be the tallest wind turbines in Europe so close to our beautiful island that until now has been pretty unspoilt and is a haven for bird life and marine life. Having these huge turbines about 6 km from shore, so tall that they will be seen from many locations across the island, will be a blight on our landscape and once they are built it will be too late. The community feels that we have been unrepresented in our objections and they have not been taken seriously. People who looked out on a beautiful clear sea horizon on the West Coast of Lewis will now be forced to look at these extremely tall turbines. Why does the wind farm have to be so enormous? Why can it not be scaled back? Why will the Hebrides not even be able to use the electricity generated? Why can the turbine not be put further outer to sea?

The community should be listened to, but like so many islanders I feel that the consultation of local views has been totally inadequate.

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: BDF3B21E

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 a detailed examination of the Environmental Impact Assessment Report and associated documents, pinpointing critical deficiencies across planning, environmental, cultural, and procedural dimensions. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, largely untouched environment, and rich cultural heritage. Concerns are raised about the scale, proximity, and design of the proposed development, which challenge its alignment with statutory obligations, national policy directives, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful assessment. It omits crucial environmental data, presents limited and inconsistent baseline information, and leaves significant components of the proposal undefined. The implementation of a flexible design framework obscures the assessment of likely significant effects, and the dependence on unarticulated mitigation measures hampers any evaluation of their potential effectiveness. Consequently, the information provided fails to facilitate a comprehensive understanding of the environmental, cultural, or community repercussions, and assertions of negligible or insignificant impacts lack robust supporting evidence.

Furthermore, clear and considerable policy discrepancies have emerged. The proposal seems at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national standards for biodiversity protection, climate considerations, and environmental integrity. These inconsistencies relate directly to the statutory tests necessary for consent and jeopardise the ability of the relevant authority to ascertain the development's acceptability in policy terms.

The unprecedented scale of this proposal raises additional concerns, as large turbines are set to be positioned in close proximity to the shoreline, provoking substantial issues regarding landscape capacity, visual impact, and environmental consequences. Collectively, the lack of adequate information, reliance on undefined mitigation strategies, weaknesses in evidence, and evident non-compliance with policy guidelines indicate that the application is incomplete and unsuitable for lawful determination. In light of these circumstances, it is imperative that the precautionary principle be enforced.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a reliable account of the potential environmental effects of the proposed project. The approach of employing a flexible Project Design Envelope, which does not commit to precise turbine sizes, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity and means that the predicted impacts may not accurately reflect the development as it will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental impacts.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that any environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of their effectiveness or assessment of residual impacts. This deferral of essential information to stages post-consent is procedurally unacceptable and runs counter to the intentions of the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly identified prior to determination.

There are also substantial evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These issues yield uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if adequate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data result in the Environmental Impact Assessment Report being both unreliable and incomplete. These flaws inhibit a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species presented in the application is materially deficient. It fails to provide a complete or reliable understanding of the ecological receptors within this area. The methodologies employed do not adequately capture species presence, behaviour, and habitat use,

leading to an incomplete baseline data set. Consequently, the assessment lacks a sound evidential basis for evaluating the impacts of the proposed development.

One significant oversight is the assessment of otters, a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. It neglects to consider their core foraging range and behavioural patterns, which means the potential effects of construction disturbance, noise, and increased activity on otters have not been adequately assessed. This oversight undermines any conclusions regarding the absence of significant effects on this species.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally unreliable, marked by significant gaps in evidence and internal contradictions that call into question its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide the necessary evidential standard to demonstrate that these species will not face adverse impacts. The turbines are proposed within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat

loss are not adequately evaluated.

A critical inconsistency arises within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, a mechanism that is only invoked when significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn lack support from the underlying evidence. Furthermore, the assessment does not adequately demonstrate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not sufficiently recognised, and reliance on modelling approaches introduces considerable uncertainty, especially for species that are severely declining, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses of the birds are not fully understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, preventing a lawful conclusion in favour of consent.

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

In conclusion, the assessment is characterised by internal inconsistency, methodological weaknesses, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally flawed, as it overlooks the West Lewis coastline as a dynamic cultural landscape wherein environment, language, tradition, and community are deeply intertwined. The approach taken in the application is overly simplistic, viewing heritage merely as isolated, static features rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is the handling of sites with cultural importance, including the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active sites for burial and spiritual practices; however, the assessment inaccurately categorises them as static elements. This failure to acknowledge their continued use, significance, and the potential impacts of development on their context leads to an incomplete understanding of cultural effects and ignores their integral role in community life.

The assessment further neglects the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These elements are vital to the area's identity yet are entirely omitted from the evaluation, resulting in a significant gap. Without addressing these aspects, a comprehensive understanding of the cultural impact of the proposed development is unattainable.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, which embodies a unique cultural identity characteristic of an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful involvement undermines the credibility of the assessment and fails to adhere to established principles of participatory decision-making related to cultural and environmental interests.

A critical procedural oversight is the failure to complete a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to scrutinise the social, cultural, and economic effects on the island community. This omission is significant and precludes a lawful determination of the application.

From a policy standpoint, these deficiencies create a direct conflict with the National Planning Framework 4, particularly regarding the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear departure from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and statutory requirements results in a considerable evidential void. The cultural impacts of the proposed development have not been adequately assessed, rendering the application insufficient for ascertaining the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical flaw that undermines the application's validity. The developer's commissioning of a Social Impact Assessment, which included focus groups with local residents, has not resulted in the publication of the full report. This omission creates a significant evidential gap, hindering both public understanding and the competent authority's ability to grasp the social risks identified through the developer's own

research.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct community engagement, are not speculative in nature. However, without access to the complete assessment, the findings lack proper scrutiny, which limits the assessment of their significance in the decision-making process.

Moreover, the proposal has been perceived as a direct threat to community identity and cohesion, with indications of “cultural loss” noted in the developer’s findings. Yet, these critical impacts have not been thoroughly integrated into the main application or given adequate consideration. The withholding of the complete Social Impact Assessment obscures the true human and social cost of the development.

This transparency issue also affects the Environmental Impact Assessment process. To fully understand the social, economic, and health impacts of a development of this scale, especially regarding community character and functioning, all data must be available. The absence of the complete dataset means that the application does not provide a thorough evidential basis for assessing the balance between potential benefits and harm.

From a policy standpoint, there is a failure to demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Developments are required to support positive health outcomes while avoiding harm; however, the available evidence suggests existing adverse effects that have not been disclosed. Without the full assessment, it cannot be confirmed that the application aligns with this policy.

The procedural implications of these shortcomings are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment, representing a material omission in the application that fails to satisfy the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would introduce a continuous and dominant industrial presence, fundamentally transforming this character and resulting in a permanent and irreversible alteration of the landscape.

The application fails to represent the full extent of this visual change. The turbines' scale and proximity would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby directly impacting visual amenity and diminishing the defining qualities of naturalness and remoteness. Furthermore, the assessment does not adequately convey the significance of this level of impact in the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This raises the risk of understating the magnitude of visual impact and questions the reliability of the assessment.

Moreover, the assessment neglects to evaluate the interconnectedness of landscape, seascape, and cultural heritage. Notable sites, such as the Calanais Standing Stones and other Scheduled Monuments, exist within a wider landscape setting, interconnected by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with the National Planning Framework 4 concerning the protection of natural environments and historic assets. The extent of change proposed is at odds with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The absence of a thorough worst-case assessment further challenges any assertion of compliance with policy.

Ultimately, the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than capable of being reduced to an acceptable level through any means of mitigation.

In conclusion, the assessment is deficient in accurately portraying the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a trustworthy evaluation and reinforce the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application lacks the necessary detail to properly assess construction and pollution risks, rendering the environmental evaluation fundamentally inadequate. It involves extensive seabed preparation and installation within a challenging Atlantic environment, yet fails to present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on unspecified future mitigation and contingency measures, which hinders any meaningful assessment of their effectiveness or sufficiency.

This dependence on vague future strategies is particularly alarming given the sensitivity of the West Lewis coastline, which is home to clean coastal waters and significant habitats susceptible to sediment disruption and contamination. Although the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail how these will be prevented, monitored, or controlled.

There is significant uncertainty concerning the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on already identified sensitive marine species and habitats.

Moreover, the lack of thorough emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application precludes evaluation of whether suitable safeguards are in place for responding to pollution incidents. This introduces procedural risk and diminishes the ability of the competent authority to assess environmental protection measures adequately at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards is at odds with the Environmental Impact Assessment requirements. The assessment of likely significant effects and mitigation should occur prior to granting consent; without this critical information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the absence of clearly defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts collectively render the assessment materially deficient. These flaws hinder a comprehensive evaluation of construction and pollution risks, further reinforcing the position that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of fisheries and marine life presented in this application is inadequate and fails to deliver a thorough evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem alongside a vital fishing industry, yet the application does not convincingly demonstrate

that these uses and habitats can be preserved without causing considerable disruption.

A significant concern arises from the assumption that fishing activities can be relocated without repercussions. There is no supporting evidence that alternative fishing grounds are not only available but also accessible and capable of absorbing additional pressure. This critical gap poses a risk of overfishing in other areas, which could lead to detrimental economic consequences for the local fishing fleet. In the absence of a clear, evidence-based assessment, the effects on fisheries and the livelihoods they support remain unclear.

Moreover, the proposal brings with it considerable risks to marine species, particularly due to the underwater noise associated with construction. The use of high-energy hammer piling over an extended period is likely to create disturbances over large distances, impacting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises urgent concerns, yet these effects are minimised in the application without sufficient supporting evidence.

There is a troubling inconsistency within the application, where the necessity for licences to allow harm to European Protected Species is acknowledged, while simultaneously downplaying the impacts as negligible. This contradiction undermines the assessment's credibility and raises serious issues regarding compliance with the Habitats Regulations, particularly where anticipated harm requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application involves significant onshore infrastructure works, including cabling across protected moorland and the construction of a substation near Stornoway, which raises serious concerns. These works are linked to sensitive landscapes and require excavation in areas of deep peat, particularly within Barvas Moor, which serves as a

crucial carbon store and ecologically sensitive habitat. However, the assessment provided is materially incomplete, failing to consider the full extent of impacts associated with the integrated nature of the project. By assessing offshore turbines and onshore elements separately, the application obscures the true scale of environmental and socio-economic effects.

The exclusion or deferral of onshore impact assessments hinders the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates a comprehensive evaluation of all project components, yet this disjointed approach prevents a full understanding of the combined impacts on peatlands, habitats, and local communities. This is particularly concerning given the risks to sensitive habitats, including machair systems and peatland environments that are under policy protection. There is a clear evidential gap regarding biodiversity protection, as the application does not adequately demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied.

Moreover, the proposal raises pressing issues related to carbon balance. Disturbance of peatland may release stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy initiatives. The application fails to address this crucial issue adequately or to show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence indicating that the necessary consents or processes have been initiated, raising doubts regarding deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application's reliability. Consequently, the separation of project components, lack of comprehensive assessment, and absence of evidence on environmental and land use impacts render this portion of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant omission within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which play a vital role in environmental quality, cultural identity, and the tourism sector. The introduction of permanent red aviation lighting, which would be visible over long distances, would create a continuous and intrusive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape

character, and the experiences of residents and visitors. This is particularly important as dark skies are integral to the area's identity and to emerging sectors like astro-tourism. The omission results in a significant gap in the landscape and environmental assessment.

More importantly, there is no analysis of how the proposal would impact nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, which can disorient them and increase the risk of collisions. The application does not incorporate any lighting impact assessment or phototaxis study, leading to a failure to determine how aviation lighting may affect these species or contribute to increased mortality rates.

The use of daytime survey data in the ornithological assessment further complicates the situation, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation caused by artificial lighting; however, this risk has not been addressed. The lack of site-specific night-time data creates a significant gap in understanding the ecological impacts.

Without a proper evaluation of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites may be adversely impacted. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions conflict with the National Planning Framework 4 regarding the protection of natural places and environmental quality. They also weaken the overall assessment of landscape and seascape impacts, as the night-time character is an essential component of the environment.

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

TOURISM

The application presents a serious shortcoming in its evaluation of tourism impacts, crucial for understanding the economic and social implications for the Isle of Lewis. Tourism in this area is heavily reliant on its wild coastline, nearly untouched landscapes, dark skies, and a distinct sense of remoteness. Although it is noted that 86% of visitors are attracted by the scenery, the assessment does not quantify how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this key sector.

The tourism industry has seen remarkable growth, expanding 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 fails to model the potential impacts of seascape industrialisation and the decline in environmental quality on Tourism Gross Value Added and broader economic resilience. This lack of analysis hampers the ability to ascertain whether the proposed development would provide a net economic benefit or pose a threat to an established and flourishing sector.

Furthermore, the assessment neglects to consider how environmental quality underpins tourism, particularly the significance of unspoiled landscapes and dark skies to the visitor experience, as well as emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this issue, leading to a substantial gap in understanding the effects on a vital and expanding segment of the local economy.

In a community where economic diversification is limited, the oversight in assessing tourism impacts has broader repercussions for employment, local enterprises, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been properly evaluated in accordance with the requirements outlined in the Islands (Scotland) Act 2018.

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

In summary, the combined failures to quantify tourism impacts, evaluate the environmental factors that influence visitor behaviour, and account for the island's economic dependence lead to a significant evidential gap. This undermines the possibility of a thorough evaluation of the economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when measured against statutory duties, national policy, and evidential standards. The application echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a significant concern. This new application is now put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis provided for this application. The design envelope remains undefined, and the reliance on unspecified mitigation measures raises concerns. Furthermore, essential impact pathways—including effects on nocturnal wildlife, full onshore infrastructure, and tourism—have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, which

inhibits a comprehensive understanding of the likely significant effects and residual impacts.

Procedural issues are also evident. The failure to submit a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

This proposal directly contravenes the National Planning Framework 4. It does not sufficiently demonstrate protection for biodiversity, natural landscapes, and cultural heritage. It fails to indicate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leaving potential impacts on peatlands, carbon balance, habitats, and crofting land obscured.

There are also significant uncertainties regarding environmental risks. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been reached, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, along with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or employ the relevant regulatory measures to compel the submission of the missing information.

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

Additional Comments

I recently moved here to take advantage of the wild unspoiled landscapes, nit to have it follow me

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: C52BF06A

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 proposal is located off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural identity. The scale and proximity of the project, along with its design, raise immediate and significant concerns about its compliance with statutory requirements, national policy, and sustainable development principles.

Critical deficiencies in the documentation undermine the possibility of a lawful determination. The application lacks an adequate evidential basis, with critical environmental data missing and baseline information being limited and inconsistent. Furthermore, key aspects of the proposal remain undefined, and the use of a flexible design framework obstructs a clear understanding of likely significant effects. Additionally, the reliance on unspecified mitigation measures means that their effectiveness cannot be properly assessed. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects are unsupported by robust evidence.

There are clear policy conflicts that further challenge the application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, cultural heritage, and health and wellbeing. The proposal does not demonstrate that national requirements for protecting biodiversity and environmental integrity can be satisfied. These conflicts directly affect the statutory tests needed for consent and compromise the authority's capacity to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal raises serious issues concerning landscape capacity, visual dominance, and environmental impact, especially with large turbines positioned closely to the shoreline. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable overview of the potential environmental consequences of the proposal. The application's reliance on a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or

configurations, introduces considerable uncertainty. This uncertainty obstructs the application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. As a result, the impacts outlined may not accurately represent the development that is ultimately realised, leaving both the public and the competent authority unable to grasp the true extent of the environmental effects.

Consent is being requested based on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. This approach precludes any meaningful evaluation of effectiveness or assessment of residual impacts, as it defers critical information to post-consent stages. Such a deferral is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and their mitigations are clearly established before any determination.

Moreover, there are substantial evidential deficiencies, including inadequate baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These gaps generate uncertainty regarding the magnitude and significance of impacts, especially where claims of negligible or non-significant effects are made without sufficient supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that cannot align with statutory obligations.

Consequently, the application does not satisfy the evidential threshold required under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, 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, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report untrustworthy and incomplete. These shortcomings inhibit a lawful and robust assessment of environmental effects, thereby leaving the competent authority unable to make a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to meet the statutory requirements of the Environmental Impact Assessment regime, particularly in its assessment of alternatives. Instead of offering a structured and reasoned comparison of feasible alternatives based on their environmental effects, the application presents a narrative of the project's evolution. This method does not adequately demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons regarding

alternative offshore locations, development scales, or design configurations. Notably, the developer has not shown that placing turbines further offshore has been seriously considered, despite the likelihood that such a move would reduce visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact make this omission particularly concerning. Without such analysis, it is impossible to assert that the proposed siting is the least damaging option.

The deficiencies also extend to the assessment of cable routing and landfall. There is insufficient evidence indicating that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy, coupled with the absence of comparative analysis, suggests that the principles of mitigation by design have not been employed, with an overreliance on post-design mitigation measures instead.

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

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, especially concerning the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that leads to the conclusion that the application has not been properly evaluated and cannot be lawfully determined.

MARINE ECOLOGY AND PROTECTED SPECIES

The methodologies employed in assessing marine ecology and protected species are fundamentally flawed, resulting in an unreliable understanding of the ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the incomplete baseline data means that the presence, behaviour, and habitat use of various species have not been adequately captured. The implications of this are significant, as it undermines the validity of the assessment in evaluating potential impacts.

A critical oversight is evident concerning otters, a European Protected Species. The application does not properly acknowledge their active utilisation of coastal areas for foraging and movement. The omission of their core foraging range and behavioural patterns means that the assessment fails to consider the potential effects of construction disturbances, noise, and increased activity on these animals. Consequently, the conclusions drawn regarding the absence of significant effects on otters lack a solid evidential basis.

The assessment of basking sharks also suffers from notable deficiencies, particularly due to the reliance on aerial surveys which introduces significant detection bias in Atlantic conditions. This methodology is likely to lead to an underestimation of their presence, especially in light of land-based observations that indicate these waters are frequented by the species. The disregard for such pertinent data results in an incomplete baseline and undermines the reliability of the conclusions drawn.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the lack of adequate baseline data inhibits a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This fosters uncertainty about the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The failure to properly identify and assess protected species introduces a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. This situation necessitates the application of the precautionary principle, thus rendering the granting of consent unlawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally unreliable, marked by significant gaps in evidence and internal contradictions that call into question its conclusions. The west coast of the Isle of Lewis hosts internationally important seabird populations, many of which are already experiencing decline. However, the application fails to provide the necessary evidential standard to demonstrate that these species will not face adverse impacts. The turbines are proposed within key foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss are not adequately evaluated.

A critical inconsistency arises within the application, wherein the developer asserts that there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, a mechanism that is only invoked when significant harm is anticipated. This contradiction undermines the reliability of the assessment and suggests that the conclusions drawn lack support from the underlying evidence. Furthermore, the assessment does not adequately demonstrate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not sufficiently recognised, and reliance on modelling approaches introduces considerable

uncertainty, especially for species that are severely declining, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly where baseline data is incomplete and behavioural responses of the birds are not fully understood.

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

From a regulatory standpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effects on the integrity of protected sites. The presence of conflicting conclusions, alongside data deficiencies and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, preventing a lawful conclusion in favour of consent.

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

In conclusion, the assessment is characterised by internal inconsistency, methodological weaknesses, and insufficient evidence. These deficiencies hinder a thorough evaluation of potential impacts and lead to the overall conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a living cultural landscape where environment, language, tradition, and community are connected. However, the assessment of cultural heritage and community identity is inadequate. It treats heritage as isolated and static assets instead of recognising their ongoing social, cultural, and spiritual roles within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are active places of burial and spiritual practice. Yet, they are categorised as static features in the assessment, which fails to consider their continued use and the development's impact on their setting. This mischaracterisation leads to an incomplete understanding of cultural effects and disregards their importance to community life.

Additionally, the assessment neglects intangible cultural heritage like the Gaelic language and traditions, as well as the community's longstanding relationship with the coastal environment. These elements are central to the area's identity but are entirely absent from the evaluation, resulting in a significant oversight. Without addressing these factors, the true cultural impact of the development cannot be grasped.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as an Indigenous People, has not been consulted through a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the assessment's legitimacy and does not adhere to established principles of participation concerning cultural and environmental interests.

Moreover, there is a critical procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. This omission hinders the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

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

In summary, the failure to assess living heritage, intangible cultural value, community rights, and statutory obligations leads to a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not sufficiently support an evaluation of the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment has significant deficiencies, particularly regarding social impacts, health, and wellbeing. While the developer engaged with local residents through focus groups, the full report has not been made available. This lack of disclosure creates a notable evidential gap, hindering both public understanding and the competent authority's ability to gauge social risks identified in the developer's research.

Summaries indicate that residents are experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct feedback and are factual, not speculative. However, the absence of the complete assessment limits scrutiny and impedes the evaluation of their significance in the decision-making process.

The proposal is seen as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Yet, these impacts have not been adequately considered in the main application or given the necessary weight. By withholding the full Social Impact Assessment, the developer obscures the real human and social costs associated with the project.

This lack of transparency also undermines the Environmental Impact Assessment process. For developments of this size, a thorough understanding of social, economic, and health impacts is crucial, especially where community character may be affected.

Without the complete dataset, the application lacks a solid evidential basis to balance potential benefits against harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm, but the evidence suggests there are existing adverse effects that remain undisclosed. Without the full assessment, compliance with this policy cannot be confirmed.

The procedural consequences are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation due to the lack of access to the complete Social Impact Assessment. This omission is material and fails to meet the evidential standards set by the Environmental Impact Assessment regime.

Overall, the non-disclosure of the full Social Impact Assessment, along with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This situation prevents a lawful determination and supports the conclusion that the application is insufficiently informed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not properly represent the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would establish a continuous industrial presence, significantly altering this character and leading to a permanent and irreversible change in the landscape.

There is also a lack of clarity in the application regarding 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. This would negatively impact visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately convey the extent of this impact or its importance within such a sensitive landscape.

Methodological issues arise from the selection and presentation of visual viewpoints. It appears that the viewpoints may not represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, which questions the reliability of the assessment.

Moreover, the assessment does not consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting, linked visually and spatially to the Atlantic horizon. By treating these sites as isolated entities, the assessment overlooks their interdependence, resulting in an incomplete evaluation

of impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and their connection to the natural horizon. This change is not merely a visual impact; it represents a broader cultural and spatial harm that has not been thoroughly evaluated in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4, which seeks to protect natural areas and historic assets. The proposed scale of change is at odds with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes the argument for policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. The resulting changes are fundamental and permanent, rather than something that can be lessened to an acceptable degree through mitigation efforts.

In summary, the assessment fails to accurately portray 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 proposal presents significant shortcomings in its assessment of construction and pollution risks, which ultimately hinders the ability to thoroughly evaluate likely environmental effects. It involves extensive seabed preparation and installation works in a dynamic Atlantic environment, yet lacks comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are intended to be developed after consent is granted, thereby obstructing any meaningful assessment of their potential adequacy and effectiveness.

This reliance on undefined future measures is particularly troubling considering the sensitive nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on the prevention, control, or monitoring of these threats.

Moreover, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, it is impossible to assess the extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to 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 until after consent is granted, the application precludes any evaluation of whether appropriate safeguards are in place for responding to pollution incidents. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures during the determination process.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation must be evaluated before consent, and the lack of necessary information renders a lawful determination impossible. Furthermore, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, inadequate management plans, and uncertainty surrounding potential impacts render the assessment materially deficient. These deficiencies impede a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A major concern arises from the flawed assumption that fishing activities can be relocated without adverse effects. The application lacks evidence showing that alternative fishing grounds are available and suitable for increased pressure. This gap in information is crucial, as displacement could lead to overfishing in other areas, which may have broader economic ramifications for the local fishing fleet. Without a well-supported assessment, understanding the effects on fisheries and local livelihoods is compromised.

Moreover, the proposal poses considerable risks to marine species, particularly from the underwater noise generated during construction. The prolonged use of high-energy hammer piling is expected to disrupt a wide area, adversely affecting marine life such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application minimises the seriousness of these effects without adequate justification.

There is a notable inconsistency in the application where the necessity for licenses to harm European Protected Species is recognised, while simultaneously portraying impacts as negligible. This contradiction weakens the credibility of the assessment and

raises concerns about adherence to the Habitats Regulations, especially in situations where harm is expected to an extent that requires legal approval.

Furthermore, the assessment fails to address cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it remains impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not provide evidence of compliance with National Planning Framework 4 or the National Marine Plan. It does not demonstrate how the development can coexist with existing marine users or avoid unacceptable consequences for marine biodiversity, which obstructs any assertion that the proposal aligns with sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves the development of onshore infrastructure linked to offshore turbines, yet the assessment provided is materially incomplete. This fragmented approach, which treats the offshore and onshore components separately, fails to capture the full extent of environmental and socio-economic impacts associated with this single integrated project. The onshore works include cabling across protected moorland, construction of a substation near Stornoway, and the creation of associated access infrastructure, all of which traverse sensitive landscapes. Notably, these activities entail excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the project's overall environmental footprint.

Furthermore, the failure to assess onshore impacts either fully or in a timely manner prevents a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively. However, the current separation of the offshore and onshore elements obscures the combined impacts on peatlands, habitats, and local communities. This oversight poses significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not sufficiently demonstrate that the effects on these habitats have been thoroughly evaluated or that suitable avoidance measures are in place, creating a notable evidential gap regarding biodiversity protection.

The proposal additionally raises serious concerns about carbon balance. The disturbance of peatland could release stored carbon, potentially resulting in a carbon

debt that contradicts the principles of renewable energy development. The application fails to adequately address this crucial issue or show that the overall carbon balance remains favourable. Moreover, the routing of the infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence that the necessary consents or processes have been initiated, raising significant questions about the project's deliverability and lawful implementation.

From a policy standpoint, the project's failure to assess it comprehensively and to ensure the protection of peatlands, habitats, and land use interests is at odds with the National Marine Plan and National Planning Framework 4. The inability to show that adverse impacts can be avoided or mitigated further undermines the reliability of the application. In summary, the separation of project components, the absence of a comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, which ultimately prevents a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting would create a continuous and intrusive "wall of light" effect along the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the implications of this lighting for visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the local identity and the potential growth of emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts reveals a notable deficiency in the overall landscape and environmental assessment.

Critically, there has been no evaluation of how these changes might affect nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and lead to increased collision risks. The proposal does not include any lighting impact assessment or phototaxis study, meaning it fails to determine the possible effects of aviation lighting on these species and any resulting increase in mortality.

The situation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not take into account nocturnal activities or the associated risks. Species like 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 the understanding of ecological impacts.

Without assessing the effects on nocturnal wildlife, it is impossible to ascertain whether protected species or designated sites could be negatively impacted. The evidential standard required to rule out adverse effects with reasonable scientific certainty cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

Additionally, from a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It also diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a fundamental aspect of the overall ecology.

Collectively, 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 unfit for supporting a lawful determination.

TOURISM

The evaluation of tourism impacts in the application is significantly lacking and does not adequately address the economic and social implications for a crucial sector of the Isle of Lewis economy. The tourism industry relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution to the area.

Tourism has experienced substantial growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not consider how the potential industrialisation of the seascape and the associated loss of environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the community. This lack of analysis makes it impossible to ascertain whether the development would yield a net economic benefit or pose a risk to an already established and expanding sector.

Moreover, the assessment neglects to take into account the critical role of environmental quality in enhancing tourism, particularly regarding unspoiled landscapes and dark skies, which are vital to visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In a context where the island community has limited economic diversification, the oversight in assessing impacts on tourism carries 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 thoroughly evaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4, especially concerning economic impact and the necessity to prove net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and fails to supply adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

Overall, the shortcomings in quantifying tourism impacts, assessing the environmental factors influencing visitor behaviour, and acknowledging the island's economic dependency lead to a substantial evidential gap. This deficiency hampers a thorough evaluation of the economic effects and suggests that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when measured against statutory duties, national policy, and evidential standards. The application echoes the core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a significant concern. This new application is now put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps exist in the evidential basis provided for this application. The design envelope remains undefined, and the reliance on unspecified mitigation measures raises concerns. Furthermore, essential impact pathways—including effects on nocturnal wildlife, full onshore infrastructure, and tourism—have not been adequately addressed. Consequently, the Environmental Impact Assessment is incomplete, which inhibits a comprehensive understanding of the likely significant effects and residual impacts.

Procedural issues are also evident. The failure to submit a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment represents a material omission. These shortcomings hinder the competent authority from adequately evaluating the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

This proposal directly contravenes the National Planning Framework 4. It does not sufficiently demonstrate protection for biodiversity, natural landscapes, and cultural heritage. It fails to indicate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leaving potential impacts on peatlands, carbon balance,

habitats, and crofting land obscured.

There are also significant uncertainties regarding environmental risks. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been reached, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The scale of deficiencies in information, along with conflicts with policy and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or employ the relevant regulatory measures to compel the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 357A6433

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A comprehensive review of the Environmental Impact Assessment Report and accompanying documents highlights numerous material deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Situated off the west side of the Isle of Lewis, this development threatens an area celebrated for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The nature, size, and design of the proposal raise serious questions about its alignment with statutory requirements, national policy, and the essential principles of sustainable development.

The application lacks a solid evidential foundation necessary for lawful determination. It reveals significant gaps in critical environmental data, presents limited and inconsistent baseline information, and leaves essential elements of the proposal undefined. The reliance on a flexible design framework obstructs a clear understanding of the likely significant effects. Furthermore, the proposed mitigation measures, which have yet to be clearly articulated, hinder any assessment of their potential effectiveness. Consequently, the documentation fails to provide a thorough or informed perspective on the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by credible evidence.

Substantial conflicts with established policy are evident. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national mandates for protecting biodiversity, addressing climate concerns, and maintaining environmental integrity. These inconsistencies challenge the statutory tests necessary for consent and undermine the competent authority's ability to determine the proposal's acceptability in policy terms.

The scale of the proposed development is unprecedented for this locale, with large turbines located disturbingly close to the shoreline, raising significant issues regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, the reliance on unspecified mitigation strategies, evidential shortcomings, and evident policy violations illustrate that the application is fundamentally incomplete and incapable of facilitating a lawful decision. Under these circumstances, it is imperative that the precautionary principle be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, transparent, or reliable evaluation of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, lacking a commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders a consistent application of a worst-case scenario, thereby compromising the integrity of the assessment. As a result, the impacts detailed may not accurately represent the development that is ultimately realised, obstructing both public understanding and that of the competent authority regarding the true extent of environmental consequences.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent based on the premise that any environmental harm will be rectified at a later stage precludes a meaningful evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally inappropriate and contradicts the core objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigations be clearly established before a determination is made.

There exist notable evidential deficiencies as well, encompassing 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, particularly when conclusions regarding negligible or non-significant effects are offered without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This necessitates the precautionary principle's application, especially regarding protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the presence of gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings inhibit 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 assessment of alternatives is severely lacking and does not adhere to the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a

structured and reasoned comparison of viable alternatives based on their environmental effects, the application presents a narrative of project development. This method fails to show that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging alternatives.

There is a distinct absence of transparent or evidence-based comparisons regarding alternative offshore sites, development sizes, or design options. Notably, the application does not show that the developer has genuinely explored the possibility of positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. Considering the sensitivity of the West Lewis coastline and the crucial role that proximity to the shore plays in determining impact, the lack of such an analysis means that it cannot be concluded that the proposed siting is the least damaging choice available.

These shortcomings extend to the evaluation of cable routing and landfall, where there is inadequate evidence that alternative routes have been properly examined to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis indicate that mitigation by design has not been applied, relying instead on mitigation measures that come after the design phase.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through choices regarding site selection, layout, and infrastructure routing. This signifies 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 cannot be asserted that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this inadequacy jeopardises compliance with National Planning Framework 4, particularly in the context of safeguarding natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that adds to the overall conclusion that the application has not undergone sufficient evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment pertaining to marine ecology and protected species is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors present in the West Lewis coastal environment. This region is characterised by its sensitivity and biological activity, yet there exists a deficiency in the baseline data, and the methodologies employed inadequately address species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

Significantly, the assessment does not adequately acknowledge or evaluate the

presence of otters, which are classified as a European Protected Species. There is a failure to recognise their active utilisation of coastal regions for foraging and movement. This oversight, particularly concerning their core foraging range and behavioural patterns, results in a lack of thorough analysis regarding the potential impacts of construction activities, noise, and increased human presence, thereby undermining any claims of negligible effects on this species.

Moreover, the evaluation of basking sharks is similarly deficient, primarily due to the heavy reliance on aerial surveys that introduce notable detection bias, especially under Atlantic conditions. This methodological choice is likely to lead to an underestimation of the species' presence, especially when compared to established land-based observations that indicate frequent usage of the waters in question. The failure to adequately incorporate or consider such data further compounds the inadequacies in the baseline assessment and diminishes the credibility of the conclusions reached.

These methodological shortcomings result in conclusions regarding negligible or non-significant effects being based on assumptions rather than on solid evidence. Additionally, the lack of adequate baseline data obstructs a meaningful analysis of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual scale of risks posed to marine species and habitats.

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

In summary, the combination of incomplete baseline data, inadequate methodologies, and unsubstantiated conclusions culminates in an unreliable assessment. These deficiencies inhibit a rigorous evaluation of impacts on marine ecology and protected species, culminating in the overall assertion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development is located 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. The ornithological assessment accompanying the application is significantly flawed, revealing considerable gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate that these species will not be adversely affected, as required by the evidential standard.

A fundamental contradiction is present in the application, where the developer concludes that no significant adverse effects will occur 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 highlights that its conclusions are not backed by the underlying evidence. The assessment lacks sufficient evidence regarding the impact on seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, and does not adequately consider the importance of these feeding grounds. The reliance on modelling approaches leads to uncertainty, especially for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and behavioural responses are not thoroughly understood.

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

From a regulatory perspective, the application does not meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion in support of consent. Furthermore, 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 important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

Overall, the assessment is rendered unreliable due to internal inconsistency, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the overall conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally deficient, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. The application adopts an overly simplistic approach, viewing heritage merely as a collection of static assets instead of appreciating their ongoing social, cultural, and spiritual significance to the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment labels them as static features, neglecting their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete

evaluation of cultural impacts and overlooks their importance in community life.

Additionally, the application neglects to address intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are pivotal to the area's identity yet are conspicuously absent from the assessment, representing a significant oversight. The lack of consideration for these factors hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as characteristic of an Indigenous People; however, there has been no implementation of a process for Free, Prior and Informed Consent. The absence of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission, in itself, prevents a lawful determination.

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

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural implications of the development remain inadequately assessed, rendering the application insufficient for a proper evaluation of its true cultural cost.

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 assessment of visual impacts on the seascape, landscape, and cultural heritage is insufficient and does not truly capture the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, which contribute to a strong sense of remoteness. Large-scale turbines placed near the shoreline would introduce a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would have a direct impact on visual amenity and detract from the naturalness and sense of remoteness

that define the area. The assessment does not accurately convey the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the selection and presentation of visual viewpoints. There is evidence suggesting that these viewpoints might not adequately reflect the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the scale of visual impact may have been understated, which calls the reliability of the assessment into question.

Additionally, there is a failure to evaluate the interconnected relationship between landscape, seascape, and cultural heritage. Important sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked by visual and spatial relationships to the Atlantic horizon. Treating these heritage assets as isolated rather than interdependent results in a poor assessment of impacts on their setting and cultural significance.

The introduction of industrial elements to the seascape would disrupt these relationships, changing the context in which heritage assets are perceived and severing their connection to the natural horizon. This presents not just a visual issue but also broader cultural and spatial harm that has not been sufficiently analysed within 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 change is at odds with the requirement to maintain landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the impacts outlined cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be prominent and inescapable. Consequently, the change would be fundamental and permanent, and not something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The application for the proposed construction raises significant concerns due to its incomplete assessment of construction and pollution risks. Substantial seabed preparation and installation works are planned within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures to be devised after consent,

which hinders a thorough evaluation of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures, especially given the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies.

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

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

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to granting consent, and the absence of such crucial information means a lawful determination cannot be made. Additionally, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the lack of defined mitigation measures, insufficient management plans, and uncertainty surrounding potential impacts result in a materially deficient assessment. These failures impede a comprehensive evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents an inadequate assessment of fisheries and marine life, lacking a thorough evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast support a rich marine ecosystem and an active fishing industry. However, the application does not demonstrate how these important uses and habitats can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be relocated without negative consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can handle additional pressure. This lack of information is critical, as displacing fishing efforts could lead to overfishing in other

areas and have broader economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, especially due to underwater noise produced during construction activities. The high-energy hammer piling planned for an extended duration is expected to disturb marine life over large distances, notably affecting species like dolphins. The forecasted impact on a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these effects without adequate supporting evidence.

There is a clear contradiction in the application where it acknowledges the need for licences to harm European Protected Species while simultaneously describing those impacts as negligible. This inconsistency undermines the validity of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly when harm is expected to a degree that requires legal authorization.

Additionally, the assessment overlooks the cumulative impacts stemming from multiple pressures, including habitat disturbance, noise, and fishing activity displacement. A comprehensive evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

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

In summary, the assessment is incomplete and unreliable due to the lack of evidence regarding fishing displacement, underestimation of acoustic impacts, and internal contradictions. These shortcomings hinder a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is lacking and does not fully consider the impacts of what constitutes a single integrated project. The offshore turbines and onshore works are closely linked but assessed separately, leading to a fragmented evaluation that masks the true extent of the environmental and socio-economic effects.

Key onshore components include the installation of cabling across protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These activities require excavation through areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The application fails to offer a thorough assessment of these impacts, hindering a complete understanding of the project's overall

environmental footprint.

By neglecting to assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components be considered collectively; however, the disconnection between offshore and onshore elements leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

Moreover, the proposal presents substantial risks to sensitive habitats, such as machair systems and peatland environments, which benefit from policy protection. The application does not sufficiently demonstrate that impacts on these habitats have been thoroughly evaluated or that suitable avoidance measures have been implemented, creating a significant evidential gap regarding biodiversity protection.

Concerns also arise about carbon balance, as the 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 adequately address this critical issue or prove that the overall carbon balance remains advantageous.

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

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

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

TOURISM

The economic contribution of tourism to the Isle of Lewis is substantial, having increased 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 lacks a meaningful evaluation of how the proposed large-scale offshore infrastructure could impact this vital sector. Despite acknowledging that 86% of visitors are attracted by the area's natural scenery, it fails to provide a quantified analysis of how this development may alter visitor numbers, behaviour, or overall economic contributions.

The significance of environmental quality in tourism cannot be overlooked. The dependence on unspoiled landscapes and dark skies is crucial for visitor experience,

especially for emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment is particularly troubling, creating a considerable gap in understanding the effects on a sector that is not only recognised but also growing within the local economy.

In an island community that faces challenges related to economic diversification, the neglect to assess tourism impacts carries serious implications for local employment, businesses, and overall community sustainability. The lack of an 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 does not meet the requirements outlined in National Planning Framework 4, particularly concerning economic impact and the demonstration of net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic ramifications of the proposal adequately.

Overall, the failure to quantify the impacts on tourism, evaluate the environmental factors that influence visitor behaviour, and recognise the island's economic dependence on this sector results in a significant evidential gap. This omission undermines the possibility of 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 fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application echoes the critical concerns that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. The current proposal is presented under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still does not adequately address these priorities.

There are significant gaps in the evidential basis for the proposal, including incomplete baseline data and reliance on an undefined design envelope. Furthermore, the application lacks clarity regarding mitigation measures and does not address crucial impact pathways, such as those affecting nocturnal wildlife, the complete onshore infrastructure, and the implications for tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of the likely significant effects and any residual impacts.

Procedural failures are also evident. The proposal lacks a compliant Island Communities Impact Assessment, violating statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Moreover, the proposal contradicts National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural places, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. The absence of tourism impact modelling raises questions about the net economic benefit of the project. Furthermore, the cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The evidential standard required to confidently rule out adverse effects has not been achieved, necessitating the application of the precautionary principle and preventing any lawful conclusion regarding acceptable impacts.

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

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

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

Additional Comments

I OBJECT TO THIS WIND FARM.

IT IS BEING FORCED UPON US BECAUSE WE ARE A SMALL POPULATION VERY MUCH BULLYING BEHAVIOUR AND TACTICS.

IT IS MASSIVE COMPARED TO OTHER WIND FARMS. IT WILL BE A BLOT ON THE SEASCAPE DESTROY OUR DARK SKIES AND HAVE A DAMAGING EFFECT ON MARINE AND BIRD LIFE . SEA BIRDS HAVE BEEN NEGATIVELY IMPACTED BY BIRD FLU AND OTHER ENVIRONMENTAL FACTORS. IT TAKES TIME FOR NUMBERS TO RECOVER. THEY CAN ILL AFFORD FURTHER DISRUPTION BY ENORMOUS WIND TURBINES.

TOURISM IS IMPORTANT TO LEWIS NO TOURIST WANTS TO VISIT AN OUTDOOR WIND FACTORY.

HOW CAN IT BE ENVIRONMENTALLY APPROPRIATE TO DIG PEATLANDS RELEASE THE CARBON THEREIN AND LOOSE THE PEATLANDS ABILITY TO ABSORB CARBON IN THE FUTURE ; TO ACCOMMODATE INFRASTRUCTURE FOR ENORMOUS TURBINES BUILT AND TRANSPORTED IN OTHER COUNTRIES . THERE'S NOTHING ENVIRONMENTALLY FRIENDLY ABOUT THIS WINDFARM .

THE ONLY REASON TO DO THIS IS POLITICAL AND TO MAKE SOME PEOPLE /COMPANIES RICH WHILST IGNORING LEWIS IT'S PEOPLE,CULTURE, MARINE LIFE AND ENVIRONMENT .

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 131A7E7C

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in a review of the Environmental Impact Assessment Report and associated documents. It highlights significant deficiencies in planning, environmental assessments, cultural considerations, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area known for its Atlantic coastline, near-pristine environment, and rich cultural heritage. Concerns arise from the scale, proximity, and design of the project in relation to statutory obligations, national policy, and sustainable development principles.

The application lacks sufficient evidential support for a lawful decision. Important environmental data is absent, baseline information is inadequate and inconsistent, and key details of the proposal remain unspecified. The flexible design framework employed complicates understanding of potential significant impacts, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the available documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or insignificant effects that lack robust backing.

There are evident and serious policy inconsistencies. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health. It does not adequately demonstrate compliance with national obligations to safeguard biodiversity, climate-related interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impair the competent authority's ability to determine the development's acceptability within policy frameworks.

This development's scale is unprecedented for the area, with large turbines proposed near the shoreline, raising significant issues about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on vague mitigation measures, evidential shortcomings, and clear policy violations indicates that the application is incomplete and unfit for lawful consideration. Given these factors, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and lacks a comprehensive, transparent, and dependable evaluation of the potential

environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This approach compromises the integrity of the assessment, meaning that the impacts described may not accurately reflect the final development, thus hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

Moreover, the application places considerable reliance on undefined mitigation measures, monitoring strategies, and management plans that have yet to be established. Consequently, consent is sought on the premise that environmental damage will be rectified later, obstructing any substantial evaluation of efficacy or assessment of remaining impacts. This postponement of critical information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that significant effects and mitigations are clearly outlined prior to any decision-making.

Additionally, there are serious evidential shortcomings, including gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This generates uncertainty regarding the magnitude and significance of impacts, particularly when negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear comprehension of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be aligned with statutory requirements.

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

In summary, the reliance on an ambiguous design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies inhibit a lawful and robust appraisal of environmental effects, leaving the competent authority incapable of making an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant inadequacies in its assessment of alternatives, failing to satisfy the statutory requirements set forth by the Environmental Impact Assessment regime. Rather than offering a well-structured and reasoned comparison of viable alternatives based on their environmental impacts, the application provides a narrative that recounts the evolution of the project. This method does not sufficiently demonstrate that less harmful options have been appropriately identified, assessed,

and preferred over more damaging solutions.

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

These inadequacies also affect the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been thoroughly explored to avoid or mitigate impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy, combined with a lack of comparative analysis, suggests that there has been no application of mitigation by design, with an overreliance instead on post-design mitigation measures.

Consequently, the application does not convincingly demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This constitutes a failure to adhere to the established mitigation hierarchy, preventing the competent authority from ascertaining whether less harmful and more suitable alternatives exist. In the absence of a robust alternatives assessment, it is impossible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency undermines compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

One major oversight pertains to otters, classified as a European Protected Species. The application does not sufficiently recognise or assess their active utilisation of coastal areas for foraging and movement. The failure to consider their core foraging range and

behavioural patterns results in an inadequate evaluation of the potential effects stemming from construction disturbance, noise, and increased human activity. This limitation undermines any conclusions drawn regarding the absence of significant effects on the otter population.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application does not satisfy the evidential threshold required to demonstrate no adverse effect on the integrity of protected sites. There are significant gaps in evidence, internal inconsistencies, and methodological weaknesses that undermine the reliability of the ornithological assessment. The assessment fails to adequately evaluate the implications of displacement, collision risk, and habitat loss for internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline. The application suggests that no significant adverse effects are anticipated, yet it simultaneously puts forward a Habitats Regulations derogation case, which implies that significant harm is expected. This contradiction raises serious concerns about the validity of the assessment's conclusions.

Furthermore, the assessment does not sufficiently demonstrate that seabirds

associated with protected sites, including the Lewis Peatlands and St Kilda, will not be adversely impacted. The significance of these feeding grounds is not fully considered, and the reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are experiencing severe declines. The methodologies used are likely to underestimate potential mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

The siting of turbines in a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations been considered.

Collectively, these deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. The overall conclusion is that the assessment is unreliable due to its internal inconsistencies and insufficient evidence, which prevents a thorough evaluation of impacts and indicates that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment related to cultural heritage and community identity is deeply flawed, particularly in its treatment of the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are intertwined. This application diminishes heritage to a collection of disconnected, static assets, neglecting their active social, cultural, and spiritual roles within the community.

A significant oversight is evident in the evaluation of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as living places of burial and spiritual engagement, yet they are misrepresented as static features. This failure to acknowledge their ongoing use and significance not only leads to an incomplete understanding of cultural impacts but also overlooks their integral role in community life.

Additionally, the assessment neglects intangible cultural heritage, including the Gaelic language and traditions, alongside the long-established connection between the community and their coastal environment. These aspects are essential to the identity of the region, yet they are entirely omitted from the analysis, leaving a considerable gap in understanding the cultural ramifications of the development.

There are further issues regarding community rights and the lack of engagement with the Gaelic-speaking population, who possess a distinct cultural identity akin to Indigenous Peoples. The absence of a Free, Prior and Informed Consent process calls into question the validity of the assessment and contravenes recognised participatory

principles in decisions that affect cultural and environmental interests.

Moreover, there is a critical procedural shortcoming due to the failure to conduct a compliant Island Communities Impact Assessment, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination unlawful.

From a policy standpoint, these inadequacies place the proposal at odds with National Planning Framework 4, particularly concerning the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, signifies a clear deviation from policy expectations.

Ultimately, the combined neglect of living heritage, intangible cultural significance, community rights, and statutory obligations creates a substantial evidential void. The cultural effects of the proposed development have not been adequately evaluated, leaving the application insufficient for a thorough assessment of the true cultural costs involved.

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 assessment of the visual impacts and the associated seascape and landscape implications is seriously flawed and does not sufficiently acknowledge the extent of change nor the sensitivity of the receiving environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. Introducing large-scale turbines in proximity to the shoreline would create a significant and ongoing industrial presence, which would fundamentally transform the character of this landscape in a permanent and irreversible way.

Moreover, the proposal fails to accurately portray the magnitude of the anticipated visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly diminish visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment inadequately reflects the significance of these impacts within such a sensitive landscape context.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the actual visual impact has been minimised, which calls into question the assessment's overall reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. Treating these as isolated assets 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 how heritage assets are experienced and affecting their connection to the natural horizon. This is not merely a visual concern; it represents a wider cultural and spatial detriment that has not been sufficiently examined in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, especially regarding the protection of natural places and historic assets. The level of change proposed is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a rigorous worst-case assessment further weakens any assertion of policy adherence.

It is evident that the impacts identified are not likely to be mitigated effectively. Given the scale, height, and proximity of the turbines, their presence would be prominent and unavoidable. Thus, 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 depict the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings inhibit a credible evaluation and reinforce the position that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises immediate concerns due to the absence of comprehensive assessment regarding construction and pollution risks. It involves significant seabed preparation and installation activities in a challenging Atlantic environment, yet lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on future mitigation and contingency measures that will be established after consent, hindering any effective evaluation of their sufficiency or reliability.

This reliance on undefined future measures is particularly alarming given the sensitivity of the West Lewis coastline, which supports clean coastal waters and critical habitats susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to offer adequate detail on the preventive, control, or monitoring strategies that will be employed.

Furthermore, there is considerable uncertainty concerning the scale and dynamics of sediment plumes generated from seabed disturbances and cable installations. Without

robust modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is further compounded by potential effects on marine species and habitats that have already been identified as sensitive within the wider assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a post-consent stage, the application undermines the ability to determine whether suitable safeguards are in place to address pollution events. This not only introduces procedural risk but also diminishes the competent authority's capacity to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the mandates of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be reviewed prior to consent, and the absence of such critical information obstructs a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts create a materially deficient assessment. These deficiencies impede a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents serious deficiencies in its assessment of fisheries and marine life, which fails to adequately evaluate ecological or socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not demonstrate that these essential uses and habitats can be preserved without causing significant disruption.

A critical flaw in the application is the assumption that displacing fishing activities will not have consequences. There is a lack of evidence regarding the availability or accessibility of alternative fishing grounds that could support the additional pressure. This gap in the assessment is significant, as it poses the risk of overfishing in other areas and may lead to broader economic ramifications for the local fishing fleet. Without a thorough and evidence-based analysis, the potential impacts on fisheries and the livelihoods of those who depend on them remain unclear.

The proposal introduces notable risks to marine species, particularly due to the underwater noise generated during construction. The prolonged high-energy hammer piling is expected to disturb marine life over large distances, with particular concern for species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious alarms, yet the application downplays these effects without providing adequate supporting evidence.

Moreover, the application contains an internal inconsistency, as it acknowledges the need for licenses to allow harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction diminishes the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thereby failing to confirm that the proposal represents sustainable development.

In summary, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment both incomplete and unreliable. These shortcomings inhibit a robust evaluation of the implications for marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed project presents serious concerns regarding the integrity of its environmental assessment. The assessment of onshore infrastructure is materially incomplete, as it fails to consider the full extent of impacts from what is fundamentally a single integrated project. The offshore turbines and onshore works are intrinsically linked, yet they are evaluated separately, resulting in a fragmented approach that conceals the actual scale of environmental and socio-economic effects.

Key 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. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application does not offer a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By neglecting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are considered as a whole. However, the separation of offshore and onshore elements means the combined impacts on peatlands, habitats, and local communities are inadequately understood.

There are notable risks posed to sensitive habitats, including machair systems and

peatland environments, which are protected by policy. The application fails to demonstrate that impacts on these habitats have been fully assessed or that suitable avoidance measures have been taken. This creates a significant evidential gap regarding biodiversity protection.

Moreover, the proposal raises alarm over carbon balance. Disturbance of peatland releases stored carbon, potentially creating a carbon debt that is at odds with the goals of renewable energy development. The application does not sufficiently address this concern or show that the overall carbon balance remains positive.

The routing of infrastructure through active croft land introduces 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 serious questions about the deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project comprehensively and to ensure 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 undermines the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The proposed installation of permanent red aviation lighting would create a continuous and intrusive "wall of light" effect along the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the implications of this lighting for visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the local identity and the potential growth of emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts reveals a notable deficiency in the overall landscape and environmental assessment.

Critically, there has been no evaluation of how these changes might affect nocturnal wildlife. Birds such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and lead to increased collision risks. The proposal does not include any lighting impact assessment or phototaxis study, meaning it fails to determine the possible effects of

aviation lighting on these species and any resulting increase in mortality.

The situation is exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not take into account nocturnal activities or the associated risks. Species like 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 the understanding of ecological impacts.

Without assessing the effects on nocturnal wildlife, it is impossible to ascertain whether protected species or designated sites could be negatively impacted. The evidential standard required to rule out adverse effects with reasonable scientific certainty cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

Additionally, from a policy standpoint, this omission contradicts National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. It also diminishes the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a fundamental aspect of the overall ecology.

Collectively, 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 unfit for supporting a lawful determination.

TOURISM

The assessment of tourism impacts associated with the proposed development is significantly lacking, failing to adequately evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and the overall sense of remoteness. Although the application acknowledges that 86% of visitors are attracted by the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviours, or the overall economic contribution of this sector.

Tourism on the Isle of Lewis has experienced considerable growth, with revenue increasing from £65 million in 2017 to over £81.5 million, which supports more than 1,000 jobs and accounts for as much as 16% of the island's economy. Nonetheless, the application falls short by failing to model the potential impacts of industrialising the seascape and the resultant loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Without this essential analysis, it is impossible to determine whether the proposed development would yield a net economic benefit or pose a threat to an already established and expanding sector.

Furthermore, the assessment neglects to consider the critical role of environmental

quality in enhancing the tourism experience, particularly the value of unspoiled landscapes and dark skies to visitors, alongside emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

In an island community with limited economic diversification, the failure to examine the implications for tourism raises broader concerns regarding employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been evaluated, as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to illustrate net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to assess the economic consequences of the proposed development.

Collectively, the failures to quantify tourism impacts, assess the environmental drivers of visitor behaviour, and recognise the island's economic dependency result in a notable evidential gap. This lack of comprehensive evaluation undermines the ability to draw robust conclusions about the economic effects of the proposal and leads to the conclusion that the application is incomplete.

SUMMARY

The 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.

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: BDBB514B

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

Dear Sir/Madam

This letter is a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and supporting documents, highlighting material deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the compatibility of the scale, proximity, and design of the proposal with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. It contains missing critical environmental data, and the baseline information provided is limited and inconsistent. Key aspects of the proposal are not clearly defined. The flexible design framework inhibits a clear understanding of likely significant effects, while unspecified mitigation measures prevent any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of environmental, cultural, or community impacts. Claims of negligible or non-significant effects are not backed by robust evidence.

There are clear policy conflicts evident in the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural 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 relate to the statutory tests for consent and hinder the competent authority's ability to conclude that the development is acceptable in policy terms.

The scale of the proposal is unprecedented in this location, with large turbines positioned near the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In this context, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies that undermine its reliability and completeness. A flexible Project Design Envelope is employed, lacking firm commitments to specific turbine dimensions, layouts, or

configurations. This introduces substantial uncertainty and hampers the ability to consistently apply a worst-case scenario, which is essential for a credible assessment. Consequently, the impacts detailed may not accurately represent those of the development that would eventually be constructed, limiting both public understanding and the competent authority's ability to grasp the full extent of environmental effects.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application's assessment of alternatives is insufficient and fails to comply with the Environmental Impact Assessment requirements. It lacks a thorough and reasoned comparison of viable alternatives based on their environmental impacts. Instead, it merely narrates the project's development history, which does not adequately show that less harmful options have been identified and favoured over more damaging alternatives.

There is no clear or evidence-based comparison of different offshore locations, scales of development, or design options. Specifically, the application does not indicate that the developer has seriously looked into placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Considering the sensitivity of the West Lewis coastline and the crucial role of proximity to shore in assessing impact, the lack of this analysis means it cannot be concluded that the proposed site is the least damaging option.

The issues also extend to the assessment of cable routing and landfall. There is insufficient evidence that alternative routes have been explored adequately to avoid or reduce impacts on sensitive areas, including sites of cultural and spiritual significance like Barvas Cemetery. The absence of a strategy to avoid such impacts, along with a lack of comparative analysis, suggests that mitigation has not been designed in, relying instead on measures implemented after design.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through choices about site selection, layout, and routing of infrastructure. This represents a disregard for the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives. Without a thorough alternatives assessment, it cannot be said that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, these shortcomings weaken compliance with National Planning Framework 4, particularly concerning the protection of natural spaces, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant gap that leads to the conclusion that the application has not been properly evaluated and cannot facilitate a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly inadequate, failing to provide a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area constitutes a highly sensitive and biologically active marine system, yet the baseline data presented is incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, the assessment lacks a robust evidential basis for assessing potential impacts.

One critical shortcoming is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active utilisation of coastal regions for foraging and movement. The omission of their core foraging range and behavioural patterns leads to a failure in evaluating the potential impacts of construction-related disturbances, noise, and increased activity. This gap in the assessment undermines any assertions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further weaknesses, as it relies

on aerial surveys that are prone to significant detection bias, especially under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks when compared to established land-based observations, which indicate frequent usage of these waters. The neglect to incorporate or adequately consider such data results in a deficient baseline and diminishes the reliability of the conclusions drawn.

The methodological flaws mean that the conclusions of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders any meaningful assessment of cumulative and indirect impacts, such as seasonal variations and interactions within the wider ecosystem. This situation creates uncertainty about the actual risks 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 National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty generated by this assessment prevents the exclusion of adverse effects beyond a reasonable scientific doubt, 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 renders the assessment unreliable. These deficiencies impede a thorough evaluation of the impacts on marine ecology and protected species, leading to the overall conclusion that the application is built on an insufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant methodological weaknesses and internal inconsistencies that undermine its conclusions regarding the ornithological assessment. It fails to demonstrate, to the necessary evidential standard, that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. This development is situated within crucial foraging areas and migratory pathways; however, the assessment inadequately evaluates the potential implications of displacement, collision risk, and habitat loss.

There exists a fundamental contradiction within the application, as it asserts that there will be no significant adverse effects while simultaneously proposing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This inconsistency raises serious concerns about the reliability of the assessment and casts doubt on the validity of the conclusions drawn from the available evidence.

Furthermore, the assessment does not sufficiently account for the seabird species associated with protected sites such as the Lewis Peatlands and St Kilda. The critical nature of these feeding grounds is not fully recognised, and the dependence on modelling approaches introduces uncertainty, particularly concerning species facing

severe decline, including Kittiwakes and Fulmars. Methodologies employed are likely to underestimate potential mortality, particularly in light of incomplete baseline data and inadequate understanding of species' behavioural responses.

The placement of turbines within a recognised migratory corridor presents an additional significant risk, effectively obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of sustained mortality 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 deficiencies and modelling constraints, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, precluding a lawful conclusion in support of consent.

Moreover, the identified deficiencies signify non-compliance with 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 impacted directly conflicts with national policy.

Collectively, the assessment lacks reliability due to its internal contradictions, methodological flaws, and inadequate evidence. These deficiencies obstruct a thorough evaluation of impacts and substantiate the overall conclusion that the application does not meet the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is insufficient and does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply intertwined. The assessment takes a simplistic view, treating heritage as isolated and unchanging assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

A significant shortcoming is the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial sites and places of spiritual significance, but the assessment categorises them as static features, overlooking their continued use and the implications of development on their surroundings. This misrepresentation leads to an incomplete understanding of cultural effects and ignores their importance in community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the longstanding bond between the community and the coastal environment. These aspects are essential to the identity of the area but are not addressed, representing a major oversight. Without acknowledging these elements, the cultural impact of the development cannot be fully grasped.

Concerns also arise regarding community rights and participation. The Gaelic-speaking population has a unique cultural identity and is recognised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of genuine engagement compromises the validity of the assessment and does not align with established principles of involvement in decisions that affect cultural and environmental interests.

A vital procedural error is the failure to provide a compliant Island Communities Impact Assessment, which is required by the Islands (Scotland) Act 2018. Without this assessment, the responsible authority cannot meet its legal obligation to 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 National Planning Framework 4, especially concerning the safeguarding of historic sites and areas. The disregard for both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, constitutes a clear violation of policy requirements.

In summary, the lack of assessment regarding living heritage, intangible cultural value, community rights, and legal obligations creates a substantial evidential gap. The cultural consequences of the development have not been adequately evaluated, and the application does not offer a solid foundation for assessing the true cultural costs 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 West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines close to the shoreline threatens to establish a continuous industrial presence that would irrevocably alter this landscape. The assessment provided does not adequately capture the significant visual changes that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and detract from the essential qualities of naturalness and remoteness, while the assessment falls short in conveying the magnitude and significance of this impact on such a sensitive environment.

There are notable methodological flaws in how visual viewpoints have been selected and presented. Evidence points to the possibility that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, calling into question the reliability of the overall assessment.

Additionally, the evaluation fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and

other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever the existing relationships, fundamentally altering the context in which these heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not merely a visual impact but a more extensive cultural and spatial harm that has not been sufficiently evaluated in the application.

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

It is evident that the impacts identified cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the intricate relationship between landscape and heritage. These shortcomings impede a reliable evaluation and strongly support the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment related to construction and pollution risks is lacking in completeness and detail, making it difficult to evaluate potential environmental effects. The proposal entails significant seabed preparation and installation within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures to be formulated after consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures raises significant concerns. 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 accidental chemical or oil spills, it fails to provide sufficient information on the prevention, control, or monitoring of these risks.

There is also ambiguity surrounding the extent and behaviour of sediment plumes

resulting from seabed disturbances and cable installation. Without comprehensive modelling and well-defined management strategies, it becomes impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty extends to the possible effects on marine species and habitats that have been recognised as sensitive in the broader assessment.

Compounding these concerns is the lack of detailed emergency response procedures. By postponing contingency planning until after consent, the application prevents an assessment of whether adequate safeguards are in place to address pollution events. This creates procedural risks and undermines the capability of the competent authority to evaluate environmental protection measures at the determination stage.

From a regulatory standpoint, the delay in establishing critical environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant likely effects and necessary mitigations must be evaluated before consent, and in the absence of such information, a lawful determination cannot occur. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the deficiencies in defined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These issues obstruct a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life associated with the application is inadequate, lacking a thorough evaluation of ecological and socio-economic impacts. A significant flaw is the 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 increased pressure. This lack of information is critical, as the risk of displacement could lead to overfishing elsewhere, potentially resulting in wider economic repercussions for the local fleet. Consequently, without a clear, evidence-based assessment, the effects on fisheries and livelihoods remain unclear.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction. The anticipated high-energy hammer piling over a prolonged period is likely to disturb marine life across substantial distances, with particular implications for species such as dolphins. The projected disturbance to a significant portion of the local bottlenose dolphin population raises alarming issues, yet the application tends to minimise these effects without sufficient supporting evidence.

There exists a troubling inconsistency within the application, as it acknowledges the

necessity of licences to permit harm to European Protected Species, while simultaneously describing these impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where harm is expected to an extent that requires legal authorisation.

Additionally, the assessment neglects to consider cumulative impacts resulting from multiple pressures, including habitat disturbance, noise, and the displacement of fishing activity. Without a comprehensive evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions is not possible.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The onshore components of the project encompass cabling across protected moorland, the construction of a substation near Stornoway, and the development of associated access infrastructure within sensitive landscapes. These activities involve excavation across areas of deep peat, particularly in Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The current application lacks a comprehensive assessment of the impacts associated with these works, which obstructs a complete understanding of the project's overall environmental footprint.

The assessment of onshore infrastructure is materially incomplete, as it fails to consider the full extent of impacts from what constitutes a single integrated project. The offshore turbines and onshore activities are intrinsically linked; however, they are being evaluated separately, resulting in a fragmented approach that obscures the true scale of the environmental and socio-economic effects. By deferring the assessment of onshore impacts, the application inhibits an accurate evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components are reviewed collectively, yet the distinction between offshore and onshore elements means the combined effects on peatlands, habitats, and local communities are not fully understood.

Moreover, there are significant risks to sensitive habitats, including machair systems and peatland environments, which are subject to policy protections. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed

or that suitable avoidance measures have been implemented, highlighting a clear evidential gap in relation to biodiversity protection. Concerns regarding carbon balance also arise from the proposal. Disturbances to peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application does not adequately address this issue nor show that the overall carbon balance remains favourable.

In addition, 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, leading to concerns about the project's deliverability and lawful implementation. From a policy standpoint, the failure to assess the project in its entirety and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further diminishes the application's credibility.

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 portion of the application incomplete and unreliable, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposed development introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon. This alteration fundamentally changes the night-time environment along the West Lewis coastline, which is characterised by exceptionally dark skies that are essential to the area's environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and their impact on nocturnal wildlife has been entirely omitted from the Environmental Impact Assessment, representing a significant gap in the evaluation process.

The application fails to evaluate how this lighting affects visual amenity, landscape character, and the experiences of both residents and visitors. Given the importance of dark skies to the local identity and the growing astro-tourism sector, this omission is critical. Additionally, there is no analysis of the potential impacts on nocturnal wildlife, particularly species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting. The absence of a lighting impact assessment or a phototaxis study means that the effects of aviation lighting on these species, including the risk of disorientation and increased mortality, have not been considered.

Moreover, the ornithological assessment relies solely on daytime survey data, neglecting nocturnal activity and the associated risks. Species like Kittiwakes, which may forage or migrate at night, could also be affected by artificial lighting, but this risk remains unassessed. The lack of site-specific night-time data creates a significant shortcoming in understanding ecological impacts.

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

From a policy standpoint, this omission is inconsistent with National Planning Framework 4 regarding the protection of natural places and environmental quality. It further undermines the comprehensive assessment of landscape and seascape impacts, as night-time character is a fundamental aspect of the environment.

Overall, the failure to assess dark skies and the impacts on nocturnal wildlife creates a considerable evidential gap. The application is incomplete due to the lack of baseline data, impact modelling, and species-specific analysis, rendering it incapable of supporting a lawful determination.

TOURISM

The economic impact assessment related to tourism is severely inadequate and does not address the consequences for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly untouched landscapes, dark skies, and a sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contributions from tourism.

Since 2017, tourism has seen substantial growth, rising from £65 million 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 degradation of environmental quality could affect Tourism Gross Value Added or the wider economic resilience of the area. Without such crucial analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from an already established and expanding sector.

The assessment neglects to recognise the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding the potential impacts on an acknowledged and growing segment of the local economy.

In an island community characterised by limited economic diversification, the oversight in evaluating tourism impacts has broader implications for employment, local enterprises, and community sustainability. The failure to provide a compliant Island Communities Impact Assessment means these economic vulnerabilities remain unexamined, as mandated by 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 obligation to prove net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence to permit the competent authority to evaluate the economic ramifications of the proposal.

All these factors combined—the failure to quantify tourism impacts, the oversight of environmental influences on visitor behaviour, and the disregard for the island's economic dependencies—culminate in a significant evidential gap. This inhibits a thorough assessment of the economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally inadequate in meeting the criteria for sustainable development as set forth by statutory obligations, national policy, and evidential standards. It echoes the principal concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. This current proposal, despite being under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to address these critical issues.

Furthermore, the application lacks a comprehensive and reliable evidential foundation for assessment. It presents significant deficiencies in baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and neglects to consider important impact pathways related to nocturnal wildlife, the full scope of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is incomplete, inhibiting a thorough understanding of the potential significant effects and residual impacts.

Procedural errors are also evident. The failure to provide a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as mandated by the Islands (Scotland) Act 2018. Additionally, the omission of a complete Social Impact Assessment presents a material shortfall, obstructing the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for consideration.

The proposal contravenes the National Planning Framework 4 by not sufficiently demonstrating the protection of biodiversity, natural sites, and cultural heritage. It does not adequately assess health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, leaving potential effects on peatlands, carbon balance, habitats, and crofting land obscured.

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

Moreover, the proposal would lead to substantial and irreversible alterations to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and effects on tourism are permanent changes that cannot be mitigated to a satisfactory degree.

In summary, this application is procedurally and substantively unfit for determination. The multitude of information gaps, coupled with conflicts in policy and unresolved environmental uncertainties, impede a lawful and evidence-based decision. The competent authority must reject this application outright or utilise the applicable regulatory measures to require the submission of the necessary information.

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

Additional Comments

The location and scale of this development should never have been entertained from the outset. & wouldn't have been if not for untruths stated by our Local Authority stating that the impacted resident would be supportive, based on no evidence or consultations. Turbines of this scale wouldn't be allowed near our homes & communities on land & should not be allowed to ruin our lives & livelihoods (tourism) replacing one of the last unspoilt wild coasts left in the UK for an industrial landscape is just greed pretending to be green - Take offshore offshore! not inshore 3miles from our homes !

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: 56E700B4

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline and strong cultural identity. A review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental, cultural, and procedural aspects.

The application lacks a sufficient evidential basis for a lawful determination. There are critical gaps in environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, many key elements of the proposal remain undefined. The employment of a flexible design framework hinders a clear assessment of likely significant effects, and the proposed mitigation measures, which have not yet been specified, preclude an evaluation of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

There are significant policy conflicts inherent in the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are critical to the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises further concerns, with large turbines positioned in close proximity to the shoreline, leading to significant issues regarding landscape capacity, visual dominance, and environmental impact. In light of the lack of sufficient information, the reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and incapable of supporting a lawful determination. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and fails to deliver a comprehensive, transparent, or dependable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which

lacks commitments to specific turbine dimensions, layouts, or configurations, generates substantial uncertainty and hinders the consistent application of a worst-case scenario. This issue undermines the integrity of the assessment and obscures the true extent of environmental effects from both the public and the competent authority.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have not been adequately defined. As such, consent is being sought with the expectation that any environmental harm will be addressed at a later stage. This approach obstructs meaningful evaluations of effectiveness and an assessment of residual impacts. The deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation are clearly identified prior to determination.

Significant evidential deficiencies are also present, including gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This results in uncertainties about the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot 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. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it cannot be established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings obstruct a lawful and robust assessment of environmental effects and place the competent authority in a position where it cannot determine the application based on the information that has been provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment regarding marine ecology and protected species presents significant deficiencies, lacking a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is noted for its sensitivity and biological activity, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to provide a solid evidential foundation for evaluating potential impacts.

A notable gap is the inadequate consideration of otters, a species protected under European law. The application does not appropriately recognise or assess their active utilisation of coastal regions for foraging and movement. This oversight concerning their core foraging range and behavioural patterns results in an insufficient evaluation of the potential effects from construction disturbances, noise, and increased activity. Such shortcomings call into question the conclusions drawn regarding the lack of significant effects on this species.

Further issues arise with the assessment of basking sharks, where reliance on aerial surveys creates a considerable detection bias, particularly under Atlantic conditions. This method is likely to lead to an underestimation of their presence, particularly in light of established land-based observations that indicate these waters are frequently used. The failure to integrate or adequately consider such data contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

The methodological flaws in the assessment result in conclusions regarding negligible or non-significant effects that are grounded in assumptions rather than robust evidence. The lack of comprehensive baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty surrounding the true extent of risk to marine species and habitats is concerning.

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

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an assessment that is fundamentally unreliable. These shortcomings impede a rigorous 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 fraught with significant flaws regarding its ornithological assessment, which is riddled with gaps in evidence 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 experiencing decline. However, the application does not demonstrate to the required evidential standard that these species will not suffer adverse effects. Key foraging areas and migratory pathways are within the development's location, yet the assessment fails to thoroughly evaluate the implications of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, where the developer claims there

are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only necessitated where significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the underlying evidence. Additionally, the assessment lacks sufficient evidence that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical nature of these feeding grounds is not fully recognised, and the reliance on modelling approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars, which are in severe decline. The methodologies employed likely underestimate mortality rates, particularly when baseline data is incomplete and behavioural responses are not adequately understood.

The placement of turbines within a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term consequences of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold required to conclude 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 precludes a lawful conclusion in favour of consent. Furthermore, the identified deficiencies signify non-compliance with 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 adversely affected places the proposal at odds 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 lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is fundamentally flawed. It fails to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interconnected. Instead, the application adopts a simplistic view, treating heritage as isolated, static assets while neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice; however, they have been categorised as static features in the assessment. This oversight disregards their continued significance, use, and the development's potential impact on their setting, leading to an incomplete evaluation of cultural effects and a failure to acknowledge their importance to community life.

Furthermore, the application does not take into account intangible cultural heritage aspects, such as the Gaelic language, local traditions, and the longstanding relationship between the community and the coastal environment. These factors are integral to the area's identity and their absence from the assessment represents a major shortcoming. The lack of consideration for these elements prevents a proper understanding of the cultural impact of the proposed development.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity recognised as characteristic of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the legitimacy of the assessment and does not reflect established principles of participation in decisions affecting cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, required under the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, thereby preventing a lawful determination.

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

In summary, the lack of assessment of living heritage, intangible cultural value, community rights, and adherence to statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a sufficient basis to assess the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing poses significant challenges to the evaluation process. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the absence of the full report creates a substantial evidential gap. This omission limits both public understanding and the competent authority's ability to gauge the social risks identified in the developer's own research.

Evidence suggests that residents are currently experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal, with these impacts arising from direct engagement rather than speculation. Nevertheless, the failure to disclose the complete assessment restricts proper scrutiny of these findings and hampers the assessment of their importance in the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with indications of "cultural loss" noted within the developer's findings. Despite the gravity of these impacts, they have not been adequately incorporated into the primary application nor given the necessary weight. The withholding of the full Social Impact Assessment obscures the genuine human and social costs associated with the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be compromised. The application does not provide the complete dataset required to establish a thorough evidential basis for balancing benefits against harm.

From a policy perspective, the application does not illustrate compliance with National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Without the full assessment, it is impossible to demonstrate adherence to this policy.

The procedural implications are substantial, as the competent authority cannot conduct a rigorous socio-economic and health evaluation without access to the entire Social Impact Assessment. This represents a critical omission within the application and fails to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, its undeveloped nature, and a profound sense of remoteness. The proposed introduction of large-scale turbines close to the shoreline threatens to establish a continuous industrial presence that would irrevocably alter this landscape. The assessment provided does not adequately capture the significant visual changes that would arise, as the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would directly affect visual amenity and detract from the essential qualities of naturalness and remoteness, while the assessment falls short in conveying the magnitude and significance of this impact on such a sensitive environment.

There are notable methodological flaws in how visual viewpoints have been selected and presented. Evidence points to the possibility that these viewpoints may not fully encompass the most sensitive receptors or the worst-case scenarios, particularly

concerning key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, calling into question the reliability of the overall assessment.

Additionally, the evaluation fails to recognise the interconnectedness of landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these cultural assets in isolation, neglecting their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would sever the existing relationships, fundamentally altering the context in which these heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not merely a visual impact but a more extensive cultural and spatial harm that has not been sufficiently evaluated in the application.

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

It is evident that the impacts identified cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and unavoidable. Consequently, the changes anticipated are fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately portray the scale of impact, the sensitivity of the environment, and the intricate relationship between landscape and heritage. These shortcomings impede a reliable evaluation and strongly support the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application presents a concerning contradiction regarding the potential harm to European Protected Species, where the need for licences is recognised while simultaneously describing impacts as negligible. This inconsistency raises significant doubts about the validity of the assessment and questions compliance with the Habitats Regulations, especially in cases where harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is inadequate, failing to deliver a thorough analysis of both ecological and socio-economic effects. The waters off the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry,

yet there is no demonstration that these vital uses and habitats can be safeguarded without serious disruption. A key issue is the erroneous assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence indicating that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This gap is critical, as it poses risks of overfishing in other areas and could have broader economic repercussions for the local fishing fleet.

There is also a significant oversight in evaluating cumulative impacts from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall implications for marine ecosystems and socio-economic conditions. The proposal is set to introduce considerable risks to marine species, particularly through construction-related underwater noise. The use of high-energy hammer piling over extended durations is expected to disturb marine life across wide areas, with potential adverse effects on species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without adequate supporting evidence.

Additionally, from a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or avoid significant negative impacts on marine biodiversity, which hampers any assertion that the proposal constitutes sustainable development.

In conclusion, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding nocturnal wildlife and dark skies represents a substantial gap in the Environmental Impact Assessment. The coastline of West Lewis is known for its exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism potential. The proposal includes permanent red aviation lighting that would create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application neglects to evaluate how this lighting might impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly significant given the vital role dark skies play in the identity of the area and the growth of tourism sectors such as astro-tourism. The failure to consider these aspects leads to a clear deficiency in the overall landscape and environmental evaluation.

More critically, there is no assessment of the potential impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The absence of a lighting impact assessment or phototaxis study means that the application does not address how the proposed aviation lighting might affect these species or lead to increased mortality rates.

This oversight is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture nocturnal activities or the associated risks. Kittiwakes, for example, may forage or migrate at night and are also at risk of disorientation from artificial lighting, yet this hazard has not been evaluated. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts.

Without an assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites would face adverse impacts. The necessary evidential standard to exclude potential adverse effects cannot be met, thereby invoking the precautionary principle and hindering lawful determination.

From a policy standpoint, these omissions are in conflict with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. Additionally, they weaken the comprehensive assessment of landscape and seascape impacts, as night-time character is an essential part of the overall environment.

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

TOURISM

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

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

would yield a net economic benefit or detract from an established and thriving industry.

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

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

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

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

SUMMARY

The 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

There is no need for more wind farms we are turning off the ones we have at the moment as we can't store the electric they provide. They don't provide employment as they are made in China. They are not environmentally friendly as we have no way to dispose of them when their life span is over. So why would you spoil our beautiful Islands for a lot of junk. With no idea what harm it will do in the long run.

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: 764ED581

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The grounds for this objection arise from an examination of the Environmental Impact Assessment Report and its associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural relevance, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The design, scale, and proximity of this proposal raise serious questions about its alignment with statutory standards, national policy, and sustainable development principles.

The application is lacking a sufficient evidential foundation necessary for a lawful decision. There are notable omissions of critical environmental data, while the existing baseline information is not only limited but also inconsistent. Key elements of the proposal remain vague and unclarified. The flexibility of the design framework obstructs a clear understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the provided documentation does not facilitate a comprehensive or informed assessment of the potential impacts on the environment, culture, or community. Assertions of negligible or non-significant effects are unsubstantiated by reliable evidence.

Moreover, there are explicit and serious conflicts with existing policy frameworks. The proposal seems misaligned with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and community health and well-being. It fails to demonstrate compliance with national obligations to safeguard biodiversity, climate concerns, and environmental integrity. These discrepancies directly challenge the statutory requirements for consent, undermining the capability of the competent authority to deem the development acceptable within policy parameters.

The scale of this proposal is without precedent in this area, with large turbines situated in very close proximity to the shoreline, which raises significant apprehensions about landscape capacity, visual impact, and environmental repercussions. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and evident policy conflicts illustrate that the application is incomplete and does not support a lawful decision-making process. Under these circumstances, the precautionary principle should be invoked.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the Social Impact Assessment is a critical concern that undermines the evaluation of social impacts, health, and wellbeing associated with the development proposal. While the developer conducted a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This omission creates a significant evidential gap that hampers both public understanding and the competent authority's ability to assess the social risks identified through the developer's own research.

Residents are reportedly experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts, derived from direct community engagement, highlight the pressing social issues at play. However, without access to the complete assessment, there is limited capacity for scrutiny, which in turn restricts the ability to understand the significance of these findings in the context of decision-making.

Furthermore, the proposal is viewed as a potential threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, these impacts have not been adequately addressed within the main application or given the necessary weight. The withholding of the full Social Impact Assessment obscures the actual human and social costs associated with the development.

The absence of a complete understanding of the social, economic, and health impacts is particularly concerning for a development of this magnitude, where community character and functionality may be at risk. The incomplete data set compromises the application's ability to present a full evidential basis for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not sufficiently demonstrate alignment with National Planning Framework 4 concerning health and wellbeing. Developments should contribute to positive health outcomes and mitigate harm; however, the evidence available indicates existing adverse effects that remain undisclosed. Thus, without the full assessment, compliance with this policy cannot be substantiated.

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 shortcoming in the application and fails to satisfy the evidential requirements mandated by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of current adverse impacts, renders the assessment incomplete and unreliable, preventing a lawful determination and reinforcing the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual, seascape, and landscape impacts is significantly flawed and does not adequately capture the extent of change or the vulnerability of the surrounding environment. The character of the West Lewis coastline is characterised by its unobstructed Atlantic horizon, natural state, and pronounced sense of isolation. The proposed installation of large-scale turbines in close proximity to the coast would lead to a continuous and overwhelming industrial presence, which would fundamentally change this character and result in a lasting and irrevocable alteration of the landscape.

Moreover, the application inadequately conveys the scale of this visual transformation. The turbines would overshadow views from residential locations, historical sites, and popular coastal areas, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not adequately reflect this level of impact or its significance, particularly within the context of such a delicate landscape.

There are also serious methodological issues concerning the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints might not effectively capture the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, thereby compromising the assessment's reliability.

Additionally, the assessment fails to consider the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape context, interlinked by visual and spatial relationships to the Atlantic horizon. The evaluation treats these sites in isolation rather than recognising their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The anticipated scale of change is incompatible with the obligation to preserve landscape character, visual amenity, and the setting of culturally important sites. The lack of a thorough worst-case evaluation further weakens any assertion of compliance with policy.

It is evident that the impacts identified cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence is dominant and unavoidable. Therefore, the ensuing change is fundamental and permanent, rather than

something that can be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately depict the extent of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

In conclusion, the lack of defined mitigation measures, detailed management plans,

and clarity regarding potential impacts culminates in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is fundamentally incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of onshore infrastructure, leaving a significant evidential gap regarding the project's overall environmental footprint. This project encompasses both offshore turbines and onshore works, which are intrinsically linked but have been assessed separately. Such a fragmented approach obscures the true scale of the environmental and socio-economic effects, particularly concerning the impacts on sensitive habitats and communities.

Key onshore elements include the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, all of which traverse sensitive landscapes. Excavation across deep peat areas, especially within Barvas Moor—an ecologically significant habitat and vital carbon store—has not been adequately evaluated. The lack of a full assessment prevents a proper understanding of cumulative effects and undermines the Environmental Impact Assessment process, which mandates that all components of a project be considered together.

The proposal raises critical concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights, as the application does not provide evidence of necessary consents or processes, thereby calling into question the deliverability of the project.

In terms of policy compliance, the failure to assess the project as a cohesive whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with established frameworks such as the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts on sensitive habitats have been fully assessed, or that adequate avoidance measures are in place, diminishes the reliability of the application. Ultimately, the separation of project components, alongside the absence of a thorough assessment, renders this part of the application incomplete and unfit for lawful determination.

TOURISM

The assessment of tourism impacts is fundamentally inadequate and neglects to address the economic and social consequences for a crucial sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, nearly pristine landscapes, dark skies, and sense of remoteness. The application itself notes that 86% of visitors are attracted by the scenery, yet fails to provide a quantified evaluation of how extensive offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution.

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

The assessment further overlooks the critical role of environmental quality in supporting tourism, including the value of unspoiled landscapes and dark skies for visitor experiences and emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant void in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not 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, lacking sufficient evidence to enable the competent authority to evaluate the economic implications of the proposal.

Collectively, the failure to quantify tourism impacts, assess environmental factors affecting visitor behaviour, and consider the island's economic dependency leads to a significant evidential gap. This deficiency obstructs a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm highlights a significant failure to meet the standards of sustainable development in light of statutory obligations, national policy, and evidential requirements. This application revisits the fundamental concerns that resulted in the denial of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite now being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

There are critical deficiencies in the evidential basis necessary for a thorough assessment. Key baseline data is missing, the design envelope is not clearly defined, and the proposed mitigation measures lack specificity. Furthermore, the application omits crucial impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential tourism impacts. Consequently, the

Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory obligations established under the Islands (Scotland) Act 2018. Additionally, the failure to present a complete Social Impact Assessment represents a serious omission. These lapses obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is at odds with the National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural habitats, and cultural heritage. There is insufficient evidence to confirm that the impacts on health and wellbeing are acceptable, nor does it provide a net economic benefit due to the lack of tourism impact analysis. The cumulative impact of both offshore and onshore components has not been appropriately evaluated, which obscures understanding of the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals introduce inconsistencies. The necessary evidential threshold to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal will lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption of cultural and visual connections, and negative impacts on tourism will result in permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with conflicts with policy and unresolved environmental concerns, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the appropriate regulatory provisions to demand the submission of the missing information.

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

Additional Comments

I object to the wind farm. Firstly, on the grounds of the size and the scale of the development, I am all for renewables. I know the importance of meeting on climate change targets being a geography teacher, but I feel the infrastructure needed to support this wind farm will cause more damage to the environment and create more greenhouse gases in its construction. Then then is justifiable. The building of the

infrastructure on Pete's land is concerning as it will result in more methane being released during construction. For one thing, the one thing I love about this island is a fact we have such a heat. Huge peat store and this will degrade this considerably..

I'm not objecting on the grounds of nimbaism but more to do with the extra implications for the whole of the island. Most people move here because it's left developed and I am originally from Sydney, so I appreciate the quiet and the world beauty of this place. Such a scale when farm will ruin this. I am for more small scale onshore, local community-based wind farms or offshore wind farms that actually already have the infrastructure support it.

I'm concerned about the lack of community consultation during the whole phase and the lack of clarity about how all the different projects are being linked. This is being used to make sure the community really don't know the big picture.

Object that the profits of this company won't go to any Scottish base companies but to international companies and that no money will be put back into the community in terms of reduced electricity costs. The island suffers from fuel poverty with increasing costs of oil and having a renewable plan would be great if the community would benefit from subsidized electricity.

I also am object to the increase numbers of transient workers who will put strain on our resources and our facilities in town and are very stretched and unable to cope with ferry service.

They should be investment into the community in order to support these extra workers. The jobs created may be too highly skilled for our local community or will mean in the future that the young people who get the skills will end up leaving the island and then there'll be a future problem of a rural de population.

I'll live right out outside town near Marybank and I'm concerned about the level of traffic that will be coming into town. I have a small boy who scooters to school everyday and the increased traffic and pollution will pose risks to his health as he's asthmatic and also the speed of the traffic coming into town will be too fast and cause safety concerns.

Already there are access issues to the castle grounds due to construction along the Anish road and there is concerns about pollution levels in the Creed from the disturbance of all the pest during the building the infrastructure to support this 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: 901633DF

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 applicable marine licensing and Environmental Impact Assessment regimes. It draws upon a review of the Environmental Impact Assessment Report and associated documentation, highlighting various deficiencies related to planning, environmental matters, cultural aspects, and procedural elements. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. There are profound concerns regarding the scale, proximity, and design of the proposal, particularly in terms of its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the impacts on environmental, cultural, or community aspects, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are significant and clear policy conflicts at play. The proposal does not align 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 that the national requirements to safeguard biodiversity, climate interests, and environmental integrity are achievable. Such conflicts are directly linked to the statutory tests necessary for consent and severely undermine the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns due to the large turbines being positioned in close proximity to the shoreline, leading to worries about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrates that the application is incomplete and incapable of receiving a lawful determination. In light of these circumstances, it is imperative that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, leading to a lack of reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised by high biological activity and sensitivity. However, the methodologies employed in the assessment fail to adequately document species presence, behaviour, and habitat use, resulting in an incomplete dataset that undermines the evaluation of potential impacts.

One major shortcoming is the inadequate consideration of otters, a species protected under European law. The application does not properly identify or assess their active use of coastal areas, crucial for foraging and movement. By neglecting their core foraging range and behaviour, the potential impacts of construction disturbance, noise, and increased human activity are not sufficiently evaluated. This gap significantly undermines any claims about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces a considerable risk of detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence in these waters. Established land-based observations indicate that these waters are frequently utilised by basking sharks, yet such relevant data has not been appropriately integrated into the assessment, resulting in an incomplete baseline that further weakens the overall conclusions.

These methodological shortcomings mean that the conclusions suggesting negligible or non-significant effects rely more on assumptions than on robust evidence. The lack of adequate baseline data hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including variations by season and interactions within the wider ecosystem. Consequently, there is considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application falls short of the Environmental Impact Assessment requirements and the National Planning Framework 4, primarily due to the inadequate identification and assessment of protected species. The degree of uncertainty involved prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the assessment's unreliable nature stems from incomplete baseline data, flawed methodologies, and conclusions lacking adequate support. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant contradictions that undermine its credibility, notably the developer's assertion of no significant adverse effects while simultaneously arguing for a Habitats Regulations derogation. This derogation is only pertinent where

there is an expectation of substantial harm, casting doubt on the reliability of the assessment and suggesting that the conclusions are not well-supported by the evidence provided. Furthermore, the ornithological assessment is critically flawed, revealing substantial gaps in evidence and internal inconsistencies.

The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline, yet the application fails to adequately prove that these species will not be adversely affected. Key foraging areas and migratory pathways, which are crucial for these populations, are not thoroughly evaluated in the assessment, particularly regarding displacement, collision risk, and habitat loss. The methodologies employed tend to underestimate potential mortality rates, especially given the incomplete baseline data and limited understanding of species' behavioural responses.

Siting turbines within a recognised migratory corridor introduces a severe risk, creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been sufficiently assessed, nor have the potential effects on species with limited global populations. From a regulatory standpoint, the application does not satisfy the evidential threshold needed to assert that there will be no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with gaps in data and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle, obstructing a lawful conclusion in favour of consent.

The inadequacies identified also represent a failure to adhere to the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely impacted places the proposal in direct contradiction to national policy. Collectively, these issues render the assessment unreliable, due to its methodological weaknesses and insufficient evidence, preventing a comprehensive evaluation of impacts and leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it overlooks the West Lewis coastline as a vibrant cultural landscape where environment, tradition, language, and community are deeply interconnected. The application simplifies heritage into separate, unchanging assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance within the community.

There is a notable shortcoming in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active places of burial and spiritual practice; however, the assessment designates them as static elements, failing to recognise their continued relevance, meaning, and the potential impact of development on their surroundings. This misrepresentation leads to

an incomplete understanding of the cultural effects and dismisses their importance in community life.

Moreover, the application neglects to consider intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring relationship that the community has with the coastal environment. These aspects are vital to the identity of the area, yet they are completely omitted from the assessment, which is a significant oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and involvement. The Gaelic-speaking population embodies a unique cultural identity with traits of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to align with established principles of participation concerning cultural and environmental interests.

A significant procedural flaw is the failure to conduct a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. The absence of this assessment hinders the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic effects on the island community. This omission alone obstructs a lawful determination.

From a policy standpoint, these shortcomings directly contravene the National Planning Framework 4, especially concerning the safeguarding of historic sites and landscapes. The neglect of both tangible and intangible heritage and the failure to acknowledge living cultural practices indicate a clear deviation from policy mandates.

Overall, the lack of consideration for living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a significant evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application falls short of providing a robust basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's failure to publish the full Social Impact Assessment is a critical concern that undermines the evaluation of social impacts, health, and wellbeing related to the proposed development. While a Social Impact Assessment was commissioned and included focus groups with local residents, the lack of transparency surrounding this report creates a significant evidential gap. This omission hampers both public understanding and the competent authority's ability to assess the full extent of social risks identified in the developer's own research.

Evidence indicates that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts have been derived from direct engagement rather than speculation, yet the withholding of the complete assessment prevents thorough scrutiny of these findings and restricts

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

Furthermore, there are indications that the proposal threatens community identity and cohesion, with “cultural loss” highlighted in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application or given appropriate consideration. The lack of access to the full Social Impact Assessment obscures the real human and social costs associated with the development.

This deficiency of transparency also compromises the Environmental Impact Assessment process. It is crucial to have a complete understanding of social, economic, and health implications for developments of this magnitude, particularly when community character is at stake. Without the full dataset, the application lacks a comprehensive evidential basis necessary 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 are required to promote positive health outcomes and avoid harm; however, existing adverse effects are evident and have not been fully revealed. Without the full assessment, compliance with this policy cannot be established.

The procedural consequences of this situation are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission within the application and a failure to fulfil the evidential requirements set by the Environmental Impact Assessment framework.

Overall, the combination of the non-disclosure of the full Social Impact Assessment and the existing evidence of adverse impacts renders the assessment incomplete and unreliable. This circumstance obstructs a lawful determination and highlights that the application lacks sufficient information to proceed.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is inadequate, lacking the detail necessary for evaluating potential environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans accompanying the application. Instead, it depends on the preparation of mitigation and contingency measures post-consent, which hinders a thorough assessment of their sufficiency and effectiveness.

This reliance on unspecified future measures is particularly alarming given the sensitivity of the receiving environment. The coastline of West Lewis is characterised by clean coastal waters and essential habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks associated with sediment mobilisation and potential chemical or oil spills, it fails to provide

adequate information on the prevention, control, or monitoring of these risks.

Furthermore, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from 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 extends to the possible effects on marine species and habitats identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent has been granted, the application obstructs the evaluation of whether adequate safeguards are in place to respond to pollution incidents. 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, the postponement of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Prior to granting consent, it is imperative that likely significant effects and their mitigation are thoroughly assessed, and the absence of such information precludes a lawful determination. The application also fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, insufficient management plans, and uncertainty about potential impacts results in a materially deficient assessment. These deficiencies obstruct a rigorous evaluation of construction and pollution risks and further corroborate the conclusion that the application is incomplete.

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 exhibits significant deficiencies that render it unfit for determination. The application does not fulfil the requirements for sustainable development as prescribed by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, notably the unacceptable scale of industrialisation. This new application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, fails to adequately address these concerns.

Critical gaps in baseline data undermine the evidential basis for determination. The continued reliance on an undefined design envelope and unspecified mitigation measures raises questions about the robustness of the application. Additionally, it omits vital impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of likely significant effects or residual impacts.

There are also notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the complete Social

Impact Assessment is a material omission that prevents the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies collectively contribute to the application being deemed unfit for determination.

The proposal contravenes the National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. It fails to illustrate that health and wellbeing impacts are acceptable, and it cannot provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been appropriately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

The uncertainties surrounding environmental risks are both significant and concerning. The assessments of marine ecology, seabirds, protected species, and marine mammals lack completeness and internal consistency. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

Moreover, the proposal is set to induce substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships pose permanent effects that cannot be adequately mitigated.

In summary, the application demonstrates serious procedural and substantive inadequacies. The combined scale of information deficiencies, along with conflicts with established policy and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or utilises the appropriate regulatory provisions to mandate the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C2401F42

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. A review of the Environmental Impact Assessment Report and its supporting documentation highlights numerous material deficiencies across planning, environmental, cultural, and procedural dimensions. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, nearly pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which appear fundamentally incompatible with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis for a lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and significant aspects of the proposal remain undefined. The use of a flexible design framework creates ambiguity around likely significant effects, while 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, and assertions of negligible or non-significant effects lack robust evidence.

Furthermore, the proposal exhibits clear and substantive policy conflicts, appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and hinder the competent authority's ability to conclude that the development aligns with policy standards.

The unprecedented scale of the proposal, characterised by large turbines in close proximity to the shoreline, raises significant concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack 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, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and does not offer a clear or dependable account of the potential environmental effects of the proposal. The application employs a flexible Project Design Envelope without committing to specific turbine dimensions or layouts, which creates considerable uncertainty. This flexibility hinders the ability to apply a worst-case scenario consistently and compromises the assessment's integrity. As a result, the impacts presented may not accurately represent the development that will ultimately be built, which limits both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

Additionally, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have yet to be defined. Seeking consent based on the expectation that environmental harm will be addressed later undermines any meaningful evaluation of effectiveness or the assessment of residual impacts. This postponement of crucial information to stages following consent is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment regime, which necessitates clear identification of likely significant effects and mitigation before determination.

There are substantial evidential shortcomings, such as gaps in baseline data and limitations in methodology, alongside reliance on assumptions instead of site-specific evidence. Consequently, there is uncertainty regarding the scale and significance of impacts, especially where findings of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that does not align with statutory requirements.

As a result, the application does not satisfy the evidential threshold 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 does not demonstrate adherence to National Planning Framework 4, particularly in terms of biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, unspecified mitigation, and deficiencies in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These issues hinder a lawful and thorough assessment of environmental effects and indicate that the competent authority cannot make a determination based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application fails to adequately assess alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic options based on their environmental effects, it provides a narrative account of the project's evolution. This lack of a systematic approach means

that less harmful alternatives have not been properly identified or evaluated in favour of more damaging solutions.

There is a significant lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not show that the developer has genuinely considered placing the turbines further offshore, where the potential visual, ecological, and coastal impacts might be diminished. The sensitivity of the West Lewis coastline underscores the importance of proximity to shore in assessing impact, and the absence of a thorough analysis in this regard hinders the ability to ascertain whether the proposed siting is indeed the least damaging option.

Furthermore, the shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been explored sufficiently to mitigate impacts on sensitive receptors. This includes significant sites of cultural and spiritual importance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis indicate that the project has not applied mitigation by design, relying instead on measures intended to be implemented post-design.

As a consequence, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This oversight fails to follow the established mitigation hierarchy and prevents the competent authority from determining whether more suitable and less harmful alternatives are available. Without a thorough assessment of alternatives, one cannot conclude that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, particularly concerning the protection of natural areas, cultural heritage, and the wellbeing of the community. The failure to provide a structured and comparative assessment is a significant omission that reinforces the overall conclusion that the application has not been sufficiently evaluated and thus cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development has significant shortcomings in its assessment of marine ecology and protected species, which ultimately undermines understanding of the ecological receptors within the West Lewis coastal environment. This region is known for its sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

A major gap exists in the analysis concerning otters, a European Protected Species. The application neglects to properly acknowledge and assess their active utilisation of coastal areas for foraging and movement. This oversight means that the evaluation of

potential effects from construction disturbance, noise, and increased activity is insufficient, which calls into question the conclusions drawn regarding the absence of significant effects on this species.

Further concerns arise regarding the assessment of basking sharks, as the reliance on aerial surveys introduces considerable detection bias, particularly in challenging 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 adequately incorporate or consider such data results in an incomplete baseline and diminishes the credibility of the conclusions offered.

These methodological flaws mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. This generates uncertainty about the actual level of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of 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 unfounded conclusions renders the assessment unreliable. These weaknesses hinder a thorough evaluation of the impacts on marine ecology and protected species, contributing to the overall determination that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant internal inconsistencies and gaps in evidence that compromise its conclusions. The presence of internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already experiencing declines, is not adequately addressed. The application fails to meet the required evidential standard to demonstrate that these species will not be adversely affected. Furthermore, the development is situated within key foraging areas and migratory pathways, yet the evaluation does not thoroughly assess the implications of displacement, collision risk, or habitat loss.

A notable contradiction exists in the application, as the developer claims there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only invoked when significant harm is anticipated. This

inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment also lacks sufficient evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not sufficiently recognised, and reliance on modelling techniques introduces uncertainty, particularly for species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially in cases where baseline data is incomplete and behavioural responses remain inadequately understood.

The siting of turbines within a recognised migratory corridor presents an additional and substantial risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to sufficiently evaluate the long-term consequences of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

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

The identified deficiencies also indicate 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 at odds with national policy.

In conclusion, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a comprehensive evaluation of impacts and contribute to the overall finding that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of community identity and cultural heritage is fundamentally lacking. It fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are interconnected. The application simplifies heritage into isolated, static assets, neglecting their ongoing social, cultural, and spiritual roles within the community.

A major shortcoming is evident in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These locations are active places of burial and spiritual practice. However, the assessment categorises them as static features and does not consider their continued use or the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural

effects and overlooks their importance in community life.

The assessment also ignores intangible cultural heritage, including the Gaelic language, traditions, and the community's long-standing connection to the coastal environment. These aspects are crucial to the area's identity yet are entirely absent from the evaluation, which is a significant oversight. Without considering these elements, the true cultural impact of the development remains unclear.

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

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

From a policy viewpoint, these deficiencies place the proposal in direct conflict with the 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 living cultural practices, marks a clear deviation from policy requirements.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing lacks the necessary transparency required for a lawful evaluation, thus rendering it materially deficient. A Social Impact Assessment was commissioned by the developer, which included focus groups with local residents. However, the full report has not been published, creating a significant evidential gap that obstructs both public understanding and the competent authority's ability to grasp the full extent of social risks identified through the developer's own research.

Available summaries have indicated that local residents are already facing measurable stress, anxiety, and concern due to the proposal's scale and proximity. These impacts are based on direct engagement, meaning they are not speculative. Yet, the absence of the full assessment limits proper scrutiny of these findings and hinders the evaluation of their significance in the decision-making process.

Furthermore, evidence suggests that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this identification, such impacts have not been adequately integrated into the main application or given the appropriate weight. Consequently, withholding the complete 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. A comprehensive understanding of social, economic, and health impacts is vital for developments of this scale, especially when community character and functionality may be at risk. The failure to provide the complete dataset results in the application lacking a robust evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and mitigate harm, yet the evidence available indicates existing adverse effects that have not been adequately disclosed. Without the full assessment, compliance with this policy remains unproven.

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. This represents a material omission within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises immediate concerns due to the incomplete assessment of construction and pollution risks, which fails to provide the necessary detail for evaluating environmental effects. In a high-energy Atlantic environment, substantial seabed preparation and installation works are proposed, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed post-consent, which limits the ability to assess their adequacy or effectiveness meaningfully.

Particularly alarming is the application's dependence on undefined future measures, especially given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail on the prevention, control, or monitoring of these issues.

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

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

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

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

FISHERIES AND MARINE LIFE

The proposal introduces substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life across significant distances, with concerns specifically raised about the local bottlenose dolphin population. The application appears to downplay the severity of these effects, lacking sufficient supporting evidence to justify this minimisation.

Furthermore, the assessment of fisheries and marine life is inadequate and does not offer a comprehensive evaluation of the ecological or socio-economic impacts. The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. However, the application fails to demonstrate how these uses and habitats can be protected or maintained without substantial disruption.

A critical issue lies in the assumption that fishing activity can be displaced without repercussions. The application does not provide evidence that alternative fishing grounds are available, accessible, or capable of accommodating additional pressure. This lack of information is troubling, as it raises the risk of overfishing in other areas and may lead to wider economic consequences for the local fishing fleet. Without a clear and evidence-based assessment, the implications for fisheries and local livelihoods cannot be properly understood.

There is also a notable inconsistency within the application. While the need for licences to permit harm to European Protected Species is acknowledged, impacts are simultaneously described as negligible. This contradiction undermines the credibility of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, especially when harm is expected to a level that requires legal authorisation.

Additionally, the assessment neglects to address cumulative impacts resulting from various pressures, including habitat disturbance, noise, and the displacement of fishing activity. A comprehensive evaluation of these combined effects is crucial; otherwise, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to adequately address the extensive risks associated with sensitive habitats such as machair systems and peatland environments, which are afforded policy protection. There is no evidence presented that demonstrates a thorough assessment of impacts on these habitats, nor that appropriate measures to avoid such impacts have been considered. This signifies a clear evidential gap concerning biodiversity protection.

The proposed infrastructure includes cabling across protected moorland and the construction of a substation near Stornoway, as well as related access infrastructure that traverses sensitive landscapes. These activities entail excavation in areas of deep peat, especially within Barvas Moor, which is not only ecologically sensitive but also serves as a significant carbon store. The assessment of onshore infrastructure is

materially incomplete and does not fully acknowledge the project's overall environmental footprint.

By failing to consider onshore impacts, the application obstructs a proper evaluation of cumulative effects. It is essential for the Environmental Impact Assessment process to evaluate all components of a project collectively, yet the disconnection between the offshore turbines and onshore works results in a fragmented approach that masks the true extent of environmental and socio-economic effects.

Moreover, the disturbance of peatland may lead to the release of stored carbon, which poses a threat to the carbon balance and potentially establishes a carbon debt that contradicts the objectives of renewable energy initiatives. The application inadequately addresses this significant concern and does not prove that the overall carbon balance is beneficial.

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

From a policy standpoint, the failure to assess the project as a cohesive entity, alongside an inability 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 overall inadequacy of the application, including the lack of comprehensive assessment and evidence concerning environmental and land use impacts, renders this part of the submission incomplete and unreliable, thus hindering 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 defining the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment fails to address the significant implications of the proposed permanent red aviation lighting, which would create a persistent and intrusive "wall of light" effect across the western horizon, drastically altering the night-time environment.

Moreover, the application does not evaluate how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the growing significance of dark skies for the region's identity and the emerging sector of astro-tourism. The lack of consideration for these effects reveals a substantial gap in the overall assessment of the landscape and environment.

A more critical issue arises with the absence of an evaluation concerning the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are acutely sensitive to artificial lighting, which can cause

disorientation and increase the risk of collisions. The application does not incorporate a lighting impact assessment or any study of phototaxis, neglecting to examine how aviation lighting may affect these species or contribute to higher mortality rates.

Furthermore, reliance on daytime survey data in the ornithological assessment fails to account for nocturnal activity and related risks. For instance, Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data leaves a significant gap in the understanding of ecological impacts.

Without an assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse consequences. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and obstructing a lawful decision.

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

In summary, the lack of any assessment concerning dark skies and nocturnal wildlife constitutes a significant evidential deficiency. The failure to provide baseline data, impact modelling, and species-specific analysis renders the application incomplete and inadequate for supporting a lawful determination.

TOURISM

The total contribution of tourism to the Isle of Lewis economy reached over £81.5 million, with this sector supporting more than 1,000 jobs and accounting for up to 16% of the island's economy, an increase from £65 million in 2017. Despite this growth, the application fails to model the potential impact of large-scale offshore infrastructure on tourism, particularly regarding visitor numbers and the overall economic contribution of the sector. The assessment does not provide a quantified evaluation of how the industrialisation of the seascape and a reduction in environmental quality could affect Tourism Gross Value Added or the resilience of the local economy.

Tourism heavily relies on the natural assets of the area, including its wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery; however, it neglects to assess the importance of these environmental qualities in influencing visitor experiences and emerging markets, such as nature-based tourism and astro-tourism. Furthermore, the lack of a Dark Skies Assessment exacerbates the deficiencies in the application, leaving a critical gap in understanding the effects on a recognized and expanding segment of the local economy.

In light of the limited economic diversification within the island community, the disregard for tourism impacts presents broader concerns for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment indicates that the economic vulnerabilities inherent in the region have not been sufficiently evaluated, contrary to the requirements set forth by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding the economic impact and the necessity to exhibit a net benefit. It contradicts strategic objectives that identify tourism as a priority growth sector, lacking adequate evidence for the competent authority to assess the economic ramifications of the proposed development.

Overall, the failure to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and take into account the island's economic dependence results in a substantial evidential gap. This gap obstructs a thorough evaluation of economic effects, leading to the conclusion that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria of sustainable development as evaluated against statutory obligations, national policies, and evidential standards. This application echoes the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was highlighted. Presenting it now under a policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing does not mitigate these concerns.

Moreover, the application lacks a complete and reliable evidential basis for decision-making. There are significant deficiencies in baseline data, the utilisation of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of vital impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of potential significant effects or residual impacts.

Additionally, clear procedural shortcomings exist. The failure to submit a compliant Island Communities Impact Assessment breaches statutory duties as outlined in the Islands (Scotland) Act 2018, and not disclosing the full Social Impact Assessment is a substantial omission. These gaps inhibit 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 effective protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and cannot provide evidence of a net economic benefit as it lacks tourism impact

modelling. Additionally, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, thereby obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and contain internal inconsistencies. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, activating the precautionary principle and obstructing a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

There is nothing at all clean or green about any wind farm. They are completely useless and are environmental disasters.

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: 57C43A67

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. This development is situated off the west side of the Isle of Lewis, an area celebrated for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the proposal, alongside its proximity to the shoreline, raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination, as critical environmental data is missing and baseline information is both limited and inconsistent. Key components of the proposal remain undefined, while the adoption of a flexible design framework obscures an understanding of likely significant effects. Furthermore, reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, and community impacts, with claims of negligible or non-significant effects lacking robust supporting evidence.

There are evident and substantive conflicts with policy. The proposal 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 requirements to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and hinder the competent authority's ability to ascertain the development's acceptability in policy terms.

The unprecedented scale of the proposal features large turbines positioned dangerously close to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicates that the application is fundamentally incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary completeness, transparency, and reliability regarding the anticipated environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, creates substantial uncertainty. This uncertainty hinders the consistent application of a worst-case scenario and undermines the integrity of the assessment, leading to impacts presented that may not accurately represent the actual development. Consequently, this prevents both the public and the competent authority from understanding the true extent of the environmental effects.

Moreover, the application significantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. As a result, consent is sought with the expectation that any environmental harm will be rectified subsequently. This approach hampers any meaningful evaluation of the effectiveness of proposed measures or assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be clearly identified before determination.

There are also substantial evidential deficiencies, including gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the scale and significance of impacts, particularly where conclusions of negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information precludes a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not fulfil the evidential threshold stipulated under the Habitats Regulations, which necessitates 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 fails to demonstrate compliance with the National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be established that impacts have been comprehensively assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These 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 provided.

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives and fails to meet the statutory requirements of the Environmental Impact Assessment. Instead of providing a

structured comparison of realistic alternatives based on environmental effects, it offers a narrative about the project's evolution. This method does not prove that less harmful options have been properly identified, assessed, and chosen over more damaging ones.

There is a lack of transparent and evidence-based comparisons of various 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 would likely be reduced. The sensitivity of the West Lewis coastline and the importance of proximity to shore in assessing impact highlight the need for this analysis, which is currently absent.

The deficiencies also affect 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 significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been considered, relying instead on post-design measures.

Due to these shortcomings, the application does not demonstrate that environmental harm has been minimised through the selection of site, layout, and infrastructure routing. This indicates a failure to follow the established mitigation hierarchy, which prevents the competent authority from determining if less harmful and more suitable alternatives are available. Without a robust alternatives assessment, it cannot be concluded that the proposal is sustainable or compliant with policy.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species lacks completeness and reliability, particularly concerning the ecological receptors present in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data remains inadequate, while the methodologies employed fail to accurately document the presence, behaviour, and habitat utilisation of species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A significant shortcoming involves the European Protected Species of otters, for which the application does not sufficiently recognise or assess their use of coastal regions for both foraging and movement. The neglect of their core foraging range and behavioural patterns has led to an inadequate evaluation of the potential effects arising from construction disturbance, noise, and increased activity. This oversight compromises

any conclusions drawn regarding the absence of significant effects on this species.

The assessment also encounters shortcomings regarding basking sharks, as it relies heavily on aerial surveys that introduce significant detection bias, particularly in the challenging conditions of the Atlantic. This reliance likely leads to an underestimation of the sharks' presence, especially when contrasted with established land-based observations showing frequent utilisation of these waters. The failure to integrate or properly consider such data contributes to an incomplete baseline, thereby undermining the reliability of the presented conclusions.

These methodological flaws result in findings of negligible or non-significant effects that are based on assumptions rather than substantial evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, including those related to seasonal variations and broader ecosystem interactions. Such gaps foster uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements set out in the Environmental Impact Assessment regime and the National Planning Framework 4, as protected species have not been accurately identified or assessed. The degree of uncertainty introduced obstructs the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these circumstances, it is not lawful to grant consent.

Ultimately, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies inhibit a robust evaluation of impacts on marine ecology and protected species, leading to the overall conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development raises significant concerns regarding its reliability and adherence to regulatory standards. It indicates that the west coast of the Isle of Lewis, home to internationally important seabird populations, is not adequately protected. Many of these species are already in decline, yet the application fails to provide sufficient evidence that their interests will not be adversely impacted. The turbines are sited within vital foraging areas and migratory pathways, yet the implications of displacement, collision risk, and habitat loss remain poorly evaluated.

A critical inconsistency undermines the application, as the developer asserts there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation. Such a case is only warranted when significant harm is anticipated, calling the credibility of the assessment into question. Furthermore, the application does not convincingly demonstrate that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is inadequately addressed, and reliance on modelling approaches adds uncertainty, especially for vulnerable species like Kittiwakes and Fulmars. The methodologies

employed likely underestimate mortality, particularly in light of incomplete baseline data and a lack of understanding of behavioural responses.

The placement of turbines within a recognized migratory corridor poses an additional risk by effectively obstructing a primary flight path utilized by species migrating between the United Kingdom and Iceland. The assessment fails to thoroughly consider the long-term consequences 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 meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This situation engages the precautionary principle, preventing 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 preservation of natural assets. The inability to show that internationally significant seabird populations will remain unaffected places the proposal at odds with national policy.

In summary, the assessment is fundamentally flawed due to internal inconsistencies, methodological shortcomings, and insufficient evidence, ultimately leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in the application is fundamentally inadequate, as it does not recognise the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are intricately linked. Instead, the approach taken reduces heritage to a collection of isolated, static assets, ignoring their ongoing social, cultural, and spiritual significance within the community context.

A notable shortcoming in this assessment 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. This failure to consider their continued use and the impact of development on their setting leads to an incomplete evaluation of cultural effects and neglects their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, such as the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the identity of the area and their absence from the assessment constitutes a significant omission. The cultural impact of the development cannot be comprehensively understood without acknowledging these factors.

There are additional concerns regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity with characteristics of an Indigenous People; however, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to align with established principles for participation in decisions that affect cultural and environmental interests.

A significant procedural deficiency exists in the failure to conduct a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering a lawful determination impossible.

These deficiencies directly conflict with the National Planning Framework 4 from a policy perspective, particularly concerning the protection of historic assets and places. The neglect of both tangible and intangible heritage, as well as the lack of recognition for living cultural practices, demonstrates a clear deviation from policy mandates.

Ultimately, the combined failure to assess living heritage, intangible cultural value, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately assessed, leaving the application without a sufficient foundation for evaluating its true cultural cost.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The community's wellbeing is at stake due to the significant deficiencies in the assessment of social impacts, health, and wellbeing associated with this proposal. Despite the developer commissioning a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This lack of transparency creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified through the developer's research.

Residents are already facing measurable stress, anxiety, and concern directly linked to the scale and proximity of the proposed development. These impacts have been confirmed through direct engagement and are not merely speculative. However, without access to the complete assessment, the ability to scrutinise these findings is severely limited, ultimately affecting their significance in the decision-making process.

Moreover, the proposal has been perceived as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this recognition, such impacts have not been adequately incorporated into the main application nor given the attention they deserve. By withholding the full Social Impact Assessment, the true social and human costs of the development remain obscured.

This lack of transparency further undermines the Environmental Impact Assessment process. Understanding the comprehensive social, economic, and health impacts is crucial for developments of this magnitude, especially when they threaten community character and functioning. The omission of the full dataset renders the application insufficient for assessing the balance between benefits and potential harm.

From a policy standpoint, the application fails to show compliance with National Planning Framework 4 concerning health and wellbeing. Developments should promote positive health outcomes and avoid harm, yet the evidence currently suggests existing adverse effects that have not been fully disclosed. Consequently, without the complete assessment, compliance with relevant policy cannot be verified.

The procedural implications of this situation are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without the complete Social Impact Assessment, representing a critical omission in the application and a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, paired with the evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This inadequacy prevents a lawful determination and underscores the conclusion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for large-scale turbines in close proximity to the West Lewis coastline threatens to fundamentally alter the area's character, which is defined by its open Atlantic horizon and a strong sense of remoteness. This industrial presence would result in a permanent and irreversible transformation of the landscape. The assessment of seascape, landscape, and visual impacts is materially deficient, as it does not adequately reflect the scale of change or the sensitivity of the receiving environment.

Visual impacts are understated, as the application fails to fully capture the magnitude of the visual change. The size and location of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and eroding the qualities that define naturalness and remoteness. Moreover, the assessment does not effectively convey the significance of these impacts within the context of such a sensitive landscape.

Methodological concerns arise from the selection and presentation of visual viewpoints, which may not adequately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This oversight risks underestimating the visual impact, thereby undermining the reliability of the assessment.

The interconnected relationship between landscape, seascape, and cultural heritage

has not been sufficiently assessed. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a wider landscape setting that relies on visual and spatial relationships with the Atlantic horizon. By treating these sites as isolated assets, the assessment fails to acknowledge their interdependence, resulting in 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 disconnecting them from the natural horizon. This not only represents a visual impact but also leads to broader cultural and spatial harm that the application has not properly assessed.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The anticipated scale of change is inconsistent with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a robust worst-case assessment diminishes any claim of compliance with policy.

The impacts identified cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. As a result, the change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Overall, the assessment inadequately represents the extent of impact, the sensitivity of the environment, and the interconnectedness 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 evaluation of construction and pollution risks related to the proposal is notably deficient and lacks the necessary detail to assess potential environmental impacts. There will be significant seabed preparation and installation activities in a demanding Atlantic environment, yet the application does not provide well-defined Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it depends on mitigation and contingency measures that will be formulated after consent is granted, which hampers any thorough evaluation of their potential effectiveness.

This reliance on unspecified future measures raises serious concerns, particularly due to the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats, both of which are susceptible to sediment disruption and contamination. While the application acknowledges risks, such as sediment mobilisation and accidental spills, it fails to outline adequate strategies for prevention, control, or monitoring of these hazards.

Furthermore, there is ambiguity regarding the scope and dynamics of sediment plumes

resulting from seabed disturbances and cable installations. In the absence of comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the potential extent, duration, or ecological repercussions of these impacts. This uncertainty also extends to the marine species and habitats that have already been identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent, the application restricts the ability to assess whether proper safeguards will be in place to manage pollution incidents. This creates procedural risks and compromises the capability of the competent authority to evaluate the environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards stands in conflict with the stipulations of the Environmental Impact Assessment regime. Prior to granting consent, likely significant effects and required mitigations must be thoroughly assessed, and the absence of this information means that a lawful determination cannot be reached. The application also falls short of demonstrating adherence to policy standards concerning environmental protection and water quality.

Collectively, the lack of specified mitigation strategies, inadequate management plans, and the uncertainty regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a credible appraisal of construction and pollution risks and reinforce the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a comprehensive assessment of the socio-economic and ecological impacts on 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 proposal fails to adequately demonstrate that these vital habitats and uses can be preserved or maintained without causing significant disruption.

A critical concern is the presumption that fishing activities can be relocated without repercussions. The application does not provide sufficient evidence that alternative fishing grounds exist, are accessible, or can sustain the additional fishing pressure. This significant oversight risks contributing to overfishing in other areas and could have broader economic ramifications for the local fishing fleet. The lack of a thorough and evidence-based assessment means that the impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Moreover, the proposal poses considerable risks to marine species, particularly from the underwater noise created during construction activities. The anticipated high-energy hammer piling over an extended duration is expected to disturb marine life over substantial distances, affecting species such as dolphins. The projected disturbance to a large portion of the local bottlenose dolphin population raises serious concerns, yet the application minimizes these potential effects without adequate supporting

evidence.

There exists an evident inconsistency within the application, as it acknowledges the necessity for licences to allow harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises significant concerns regarding compliance with the Habitats Regulations, particularly when potential harm necessitates legal authorisation.

Additionally, the assessment overlooks the cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential 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 fails to establish that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, which obstructs 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 inhibit a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a comprehensive assessment of onshore infrastructure, leaving a significant evidential gap regarding the project's overall environmental footprint. This project encompasses both offshore turbines and onshore works, which are intrinsically linked but have been assessed separately. Such a fragmented approach obscures the true scale of the environmental and socio-economic effects, particularly concerning the impacts on sensitive habitats and communities.

Key onshore elements include the cabling across protected moorland, the construction of a substation near Stornoway, and the associated access infrastructure, all of which traverse sensitive landscapes. Excavation across deep peat areas, especially within Barvas Moor—an ecologically significant habitat and vital carbon store—has not been adequately evaluated. The lack of a full assessment prevents a proper understanding of cumulative effects and undermines the Environmental Impact Assessment process, which mandates that all components of a project be considered together.

The proposal raises critical concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy initiatives. Furthermore, routing infrastructure through active croft land presents potential conflicts with existing land use and legal rights, as the

application does not provide evidence of necessary consents or processes, thereby calling into question the deliverability of the project.

In terms of policy compliance, the failure to assess the project as a cohesive whole and to ensure the protection of peatlands, habitats, and land use interests conflicts with established frameworks such as the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts on sensitive habitats have been fully assessed, or that adequate avoidance measures are in place, diminishes the reliability of the application. Ultimately, the separation of project components, alongside the absence of a thorough assessment, renders this part of the application incomplete and unfit for lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks any consideration of dark skies and nocturnal wildlife, which is a significant oversight. The West Lewis coastline is notable for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposed development would install permanent red aviation lighting that would create an intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

There has been no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. Given the significance of dark skies to the local identity and to the developing sector of astro-tourism, this omission is particularly concerning. The lack of consideration for these factors highlights a clear gap in the overall assessment of landscape and environmental impacts.

Furthermore, the proposal does not address the effects of artificial lighting 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 collision. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species, and the associated mortality risk, have not been evaluated.

Compounding this issue, the ornithological assessment relies solely on daytime survey data, failing to account for nocturnal activity and related risks. Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data results in a critical deficiency in understanding the ecological impacts of the proposal.

Without an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful determination of the application.

From a policy standpoint, this omission contradicts the aims of National Planning

Framework 4 concerning the safeguarding of natural places and environmental quality. It also detracts from the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the ecosystem.

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

TOURISM

The application inadequately assesses the potential impacts on tourism, which is a vital component of the Isle of Lewis economy. Tourism is deeply rooted in the region's wild coastline, near-pristine landscapes, dark skies, and overall sense of remoteness. While it is acknowledged that 86% of visitors are attracted to the scenery, there is no quantified analysis regarding how the proposed large-scale offshore infrastructure could influence visitor numbers, behaviour, or the economic contribution of tourism.

This sector has seen considerable growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the application does not model how the industrialisation of the seascape and subsequent loss of environmental quality would impact the Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or jeopardise an essential and expanding sector.

Furthermore, the significance of environmental quality in promoting tourism is neglected. The unspoiled landscapes and dark skies are crucial for enhancing visitor experiences and for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a substantial gap in understanding the impacts on a recognised and burgeoning part of the local economy.

In an island community characterised by limited economic diversification, the failure to evaluate the impacts on tourism has broader implications for employment, local businesses, and community sustainability. Additionally, the absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities inherent to the area have not been adequately addressed, contrary to the requirements set forth in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefit. It also runs counter to strategic objectives that prioritise tourism as a growth sector, failing to provide sufficient evidence for the competent authority to assess the economic ramifications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, assessing the environmental factors that drive visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This shortfall hampers a thorough evaluation of economic effects and reinforces the conclusion that the application is lacking.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties and national policy. This application presents issues similar to those that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Despite being submitted under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application lacks the necessary evidential basis for determination.

Significant gaps in baseline data are present, and the application utilises an undefined design envelope. It relies on unspecified mitigation measures and omits critical impact pathways, including those related to nocturnal wildlife, comprehensive onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, failing to provide a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are evident, particularly with the absence of a compliant Island Communities Impact Assessment, which breaches the statutory duty established under the Islands (Scotland) Act 2018. The failure to present a complete Social Impact Assessment is also a material omission. These deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

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

Environmental risks posed by the project are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

Furthermore, the proposal would lead to substantial and irreversible changes to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and the disruption of cultural and visual relationships would result in

permanent effects on tourism that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, impede a lawful, evidence-based decision. Therefore, it is essential that the competent authority refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety or require the submission of the outstanding information.

Additional Comments

Our wild places need protection not industrialisation.

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: 9F1FDDBC

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 is submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection arises from a comprehensive review of the Environmental Impact Assessment Report and the associated documentation, revealing 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, an area characterised by its Atlantic-facing coastline, nearly pristine environment, and significant cultural identity. Concerns regarding its compliance with statutory requirements, national policy, and the principles of sustainable development arise from the proposal's scale, proximity, and design.

The application lacks an adequate evidential foundation necessary for a lawful determination. There is a notable absence of critical environmental data, while baseline information is both limited and inconsistent. Additionally, key elements of the proposal are not clearly defined. The flexible design framework employed obscures a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the provided documentation fails to offer a comprehensive or informed view of the environmental, cultural, or community impacts, leading to unsupported claims of negligible or non-significant effects.

The proposal presents clear and substantial conflicts with existing 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. Furthermore, the application does not demonstrate that it can meet national obligations regarding biodiversity protection, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests required for consent, compromising the competent authority's ability to conclude that the development is acceptable according to policy.

In this location, the scale of the proposal is unprecedented, with large turbines positioned near the shoreline, which raises significant concerns about landscape capacity, visual dominance, and environmental impacts. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application relies on an undefined Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and undermines the integrity of the Environmental Impact Assessment Report, preventing a consistent application of a worst-case scenario. Consequently, the impacts presented may not accurately reflect the development that could ultimately be constructed. This obscures the true extent of environmental effects, preventing both the public and the competent authority from having a clear understanding.

There are considerable evidential deficiencies, including insufficient baseline data, limitations in the methodology, and an overreliance on assumptions rather than site-specific evidence. This lack of robust supporting data results in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made. The absence of adequate information obstructs a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that is incompatible with statutory requirements.

The application seeks consent based on the promise of addressing environmental harm through unspecified mitigation measures, monitoring strategies, and management plans at a later stage. This deferral of essential information to post-consent phases is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's requirement that significant effects and mitigation measures are established before determination.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, it fails to 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 appropriate safeguards exist.

In summary, the combination of relying on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These significant deficiencies hinder a lawful and robust assessment of environmental effects, meaning the competent authority cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents a narrative account of project evolution rather than a structured, reasoned comparison of realistic alternatives based on environmental effects. This approach is materially inadequate and fails to meet the statutory requirements of the Environmental Impact Assessment regime. There is a notable

absence of a transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. Specifically, the developer has not demonstrated a serious consideration of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in determining impact make this lack of analysis particularly concerning, preventing any conclusion that the proposed siting is the least damaging option.

Furthermore, there are significant deficiencies in cable routing and landfall assessment. Insufficient evidence exists to show that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually important areas such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis suggest that the principle of mitigation by design has not been implemented, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hampers the competent authority's ability to determine whether less harmful and more suitable alternatives are available. Without a thorough alternatives assessment, it cannot be concluded that the proposal aligns with sustainable or policy-compliant solutions.

From a policy standpoint, these deficiencies compromise compliance with National Planning Framework 4, particularly regarding the protection of natural places, cultural heritage, and community wellbeing. The omission of a structured and comparative assessment is a material issue 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 assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to offer a thorough and dependable understanding of the ecological receptors present. This region is recognised as a highly sensitive and biologically vibrant marine system; however, the baseline data available is incomplete. The methodologies employed do not adequately capture the presence, behaviour, and habitat usage of various species, leading to an assessment that lacks a solid evidential basis for evaluating potential impacts.

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

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 the application is flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. It fails to demonstrate to the required evidential standard that these species will not be adversely affected. Key foraging areas and migratory pathways have been identified in the development site, yet the assessment does not adequately evaluate the implications of potential displacement, collision risk, or habitat loss for these birds.

A fundamental contradiction exists in the application, where the developer claims there are no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is typically necessary only if significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the evidence presented. Furthermore, there is insufficient evidence regarding the potential impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not fully account for the significance of these feeding grounds, and the use of modelling

approaches introduces additional uncertainty, particularly for species experiencing severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, particularly given the incomplete baseline data and the lack of understanding regarding behavioural responses.

Moreover, the placement of turbines within a recognised migratory corridor creates a significant risk by effectively constructing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application has not properly assessed the long-term implications of sustained mortality in this corridor or the potential effects on species that have relatively small global populations.

From a regulatory viewpoint, the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data deficiencies and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle, hindering a lawful conclusion in favour of consent.

Additionally, the identified deficiencies signify 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 at odds with national policy. In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidence, all of which preclude a robust evaluation of impacts and lead to the conclusion that the application does not fulfil the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The inadequacy of the assessment regarding cultural heritage and community identity cannot be overstated. It fundamentally overlooks the West Lewis coastline, which should be recognised as a dynamic cultural landscape where the interplay of environment, language, tradition, and community is essential. The application simplistically treats heritage as disconnected, static entities, ignoring their ongoing social, cultural, and spiritual relevance within the community.

Particularly concerning is the treatment of sites that hold deep cultural significance, such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static features; they are active sites for burial and spiritual practice. By failing to acknowledge their continued use and meaning, the assessment provides an incomplete understanding of the cultural effects of the development, thereby neglecting their vital role in community life.

Moreover, the assessment lacks consideration for intangible cultural heritage, which encompasses the Gaelic language, traditions, and the enduring bond between the community and the coastal environment. These elements are integral to the area's identity, yet they are wholly absent from the assessment, highlighting a severe

oversight. Without addressing these aspects, the true cultural impact of the development remains obscured.

Equally troubling are the concerns surrounding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This failure to engage meaningfully undermines the validity of the assessment and ignores established principles that should guide participation in matters affecting cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment is a critical procedural shortcoming, as mandated by the Islands (Scotland) Act 2018. The lack of this assessment hinders the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community, which alone compromises the legality of the determination.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect to consider both tangible and intangible heritage and the failure to recognise living cultural practices indicate a clear divergence from policy requirements.

In summation, the collective failure to address living heritage, intangible cultural value, community rights, and statutory requirements leads to a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, and the application does not offer a sound basis for understanding the true cultural cost involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The failure to publish the full Social Impact Assessment is a serious oversight that compromises the evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the absence of the complete report creates a significant evidential gap. This gap prevents the public and the relevant authorities from fully grasping the social risks identified in the developer's own research.

Available summaries reveal that residents are already feeling measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement and are not mere speculation. However, the lack of transparency regarding the complete assessment inhibits proper scrutiny of the findings, thereby limiting the ability to evaluate their importance in the decision-making process.

Furthermore, there are indications that the proposal poses a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite the significance of these impacts, they have not been adequately incorporated into the main application or given the necessary consideration. By withholding the complete

Social Impact Assessment, the developer 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 implications is vital for developments of this magnitude, particularly when community character and functioning are at stake. Without access to the full dataset, the application fails to provide a comprehensive evidential basis for weighing benefits against harms.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. Developments must promote positive health outcomes and mitigate harm; however, the evidence suggests that adverse effects are already present and have not been fully disclosed. Thus, without the complete assessment, it is impossible to demonstrate compliance with this policy.

The procedural ramifications 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 material omission within the application and a clear failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the impacts on seascape, landscape, and visual elements is insufficient. It does not properly consider the extent of change or the sensitivity of the environment. The West Lewis coastline features an open Atlantic horizon and an undeveloped character, which contributes to a strong sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would create an industrial presence that alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to accurately depict the scale of visual change. The turbines' size and proximity mean they would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would harm visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not adequately communicate the level of impact or its significance within such a sensitive landscape.

Methodological issues arise from the choice and presentation of visual viewpoints. It appears that some viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests a risk that the visual impact has been

underestimated, compromising the assessment's reliability.

Another notable flaw is the lack of an evaluation of the connections between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape linked to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as separate entities, failing to acknowledge their interdependence, which results in an incomplete analysis of the impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts the National Planning Framework 4, particularly regarding the protection of natural areas and historic assets. The extent of change does not align with the necessity to preserve landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertions of compliance with policy.

Moreover, the identified impacts cannot be effectively mitigated. Given the turbines' size, height, and proximity, their presence would be dominant and unavoidable. Thus, the resulting change is fundamental and permanent, rather than something that can be reduced to an acceptable level through mitigation measures.

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

CONSTRUCTION AND POLLUTION RISKS

The 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 proposal raises serious concerns regarding its impact on fisheries and marine life, particularly as it pertains to the waters off the West Lewis coast, which sustain a diverse marine ecosystem and an active fishing industry. The application does not adequately demonstrate that the ecological and socio-economic needs of these areas will be protected or maintained without significant disruption.

A major issue lies in the assumption made by the application that fishing activity can be displaced without any consequences. There is no evidence provided that alternative fishing grounds are available, accessible, or capable of supporting the additional pressure that displacement would create. This absence of information is critical, as it raises the risk of overfishing in other areas and could have broader economic repercussions for the local fishing fleet. Without a clear and evidence-based evaluation, the potential impacts on both fisheries and local livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to the underwater noise generated during construction. High-energy hammer piling over an extended period is expected to create disturbances that could affect a wide range of species, including dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population should be of serious concern, yet the application

downplays the severity of these effects and lacks sufficient supporting evidence.

Moreover, there is an apparent inconsistency within the application, which acknowledges the requirement for licenses to permit harm to European Protected Species while simultaneously characterising the impacts as negligible. This contradiction calls into question the reliability of the assessment and raises issues of compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, which obstructs any conclusion regarding the sustainability of the development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The offshore turbines and onshore works are interconnected, yet the assessment treats them separately. This fragmented approach fails to capture the overall environmental and socio-economic effects of what is a single integrated project.

Onshore elements involve cabling across protected moorland, the construction of a substation near Stornoway, and the creation of access infrastructure through sensitive landscapes. These activities entail excavation across areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and ecologically sensitive habitat. The application does not adequately assess these impacts, limiting the understanding of the project's total environmental footprint.

By excluding or postponing 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 be considered together, yet the separation 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 by policy. The application fails to show that these

impacts have been thoroughly assessed or that suitable avoidance measures have been implemented. This creates a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance also arise from the proposal. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy development goals. The application does not sufficiently address this issue or confirm that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, prompting questions about deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The 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 proposed development raises serious concerns regarding its implications for the tourism sector on the Isle of Lewis. Tourism is a crucial component of the local economy, having expanded significantly from £65 million in 2017 to over £81.5 million, and providing support for more than 1,000 jobs while representing up to 16% of the island's economy. Despite this, the application does not adequately assess how the proposed large-scale offshore infrastructure could impact visitor numbers, behaviour, or the overall economic contribution of tourism. The assessment fails to recognise that 86% of visitors are attracted to the area primarily for its scenery.

Moreover, the application neglects to model how the industrialisation of the seascape and degradation of environmental quality could affect Tourism Gross Value Added and the overall resilience of the economy. Without such critical analysis, it remains unclear whether the development could offer any net economic benefit or, conversely, jeopardise a vital and expanding sector.

The evaluation also disregards the importance of environmental quality, particularly unspoiled landscapes and dark skies, which are essential to the visitor experience and burgeoning markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment adds to the deficiencies in the analysis, resulting in a substantial gap in understanding the effects on this increasingly significant part of the local economy.

In an island community with limited economic diversification, the lack of assessment regarding tourism impacts has broader implications for employment, local businesses, and community sustainability. The failure to conduct a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unexamined, in

violation of the requirements set forth under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, especially concerning economic impact and the necessity to prove 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 repercussions of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental drivers influencing visitor behaviour, and acknowledge the island's economic reliance results in a significant evidential gap. This gap hinders 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 demonstrates significant shortcomings in meeting the essential criteria for sustainable development, as established by statutory duties, national policy, and evidential standards. It mirrors the fundamental issues that resulted in the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a central concern. This current application, however, is being assessed within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical analysis reveals that the application lacks a complete and reliable evidential foundation necessary for a thorough determination. Notable gaps exist in the baseline data, and there is continued reliance on an unspecified design envelope, alongside mitigation measures that have yet to be clearly defined. Furthermore, it neglects to address key impact pathways related to 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.

Moreover, the process has encountered clear procedural failings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of statutory obligations under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally misaligned. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Additionally, it fails to prove that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, primarily due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components is

insufficient, leaving the effects on peatlands, carbon balance, habitats, and crofting land obscured.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and often inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents any lawful conclusion that the impacts can be deemed acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The substantial deficiencies in information, coupled 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 relevant regulatory provisions to ensure the submission of the missing information.

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

Additional Comments

Currently Scotland produces enough energy therefore a windfarm of this scale does not benefit our island community.

With these turbines only having a lifespan of 35 years we locals do not see the benefit due to energy already produced and the impact it will have on tourism and defacing an area of outstanding natural beauty.

The locals will also not benefit from any lower energy costs and if anything it will bring our bills up while we already pay the most money for electric in Europe.

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: 32DA0438

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment considerations. A thorough review of the Environmental Impact Assessment Report and accompanying documents reveals serious deficiencies in planning, environmental, cultural, and procedural aspects. Located off the west coast of the Isle of Lewis, this region is characterised by its Atlantic-facing coastline, relatively untouched environment, and strong cultural significance. The proposal's scale, design, and proximity to the shore raise profound concerns regarding its alignment with statutory requirements, national policy, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and fails to provide a transparent and reliable account of the likely environmental effects of the proposal.

The use of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, creates significant uncertainty. This lack of commitment undermines the integrity of the assessment and means that the impacts presented may not accurately reflect the final development. As a result, both the public and the competent authority cannot fully understand the true extent of environmental effects.

The application depends heavily on mitigation measures, monitoring strategies, and management plans that have not been clearly defined. Seeking consent on the assumption that environmental harm will be managed later prevents any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of crucial information until after consent is granted is procedurally unacceptable and contradicts the goals of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation should be established prior to decision-making.

Moreover, there are serious gaps in evidence, including incomplete baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty about the scale and significance of the impacts, particularly where claims of negligible or non-significant effects lack robust supporting data. The insufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot meet statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. The proposal also fails to comply with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it is not demonstrated that impacts have been fully assessed or that suitable safeguards are in place.

In conclusion, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data make the Environmental Impact Assessment Report unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the provided information.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of presenting a transparent analysis based on environmental effects, it offers a narrative account of project development. This omission indicates that the identification, assessment, and selection of less harmful options in preference to more damaging solutions have not been adequately conducted.

Furthermore, there is a notable lack of evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the possibility of placing turbines further offshore has been seriously evaluated, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the significance of proximity to the shore in assessing impact, underscores the importance of this analysis. Without it, one cannot conclude that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with the lack of comparative analysis, suggests that mitigation by design has not been applied, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been effectively minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to assess whether more appropriate and less harmful alternatives exist. The lack of a robust alternatives assessment ultimately raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is characterised as a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of the ecological receptors present. The methodologies employed do not adequately capture species presence, behaviour, or habitat use, leading to an incomplete baseline data set that undermines the evidential basis for evaluating impacts.

One notable shortcoming is the failure to properly assess otters, a European Protected Species. The application neglects to recognise their active use of coastal areas for foraging and movement. Consequently, the assessment does not address their core foraging range or behavioural patterns, resulting in an insufficient evaluation of potential effects from construction disturbance, noise, and increased activity. This lack of consideration undermines any claims regarding the absence of significant effects on

this species.

Additionally, there are critical deficiencies in the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. Established land-based observations indicate frequent usage of these waters, yet such data has not been adequately incorporated or considered. The methodological limitations inherent in the assessment mean that conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. Furthermore, the absence of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty around the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be excluded beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these circumstances, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions makes the assessment unreliable. These shortcomings impede a thorough evaluation of impacts on marine ecology and protected species, leading to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 West Lewis coastline embodies a living cultural landscape, where community, environment, language, and tradition are interwoven. However, the assessment of cultural heritage and community identity is severely lacking. It approaches heritage as isolated, unchanging assets, neglecting their dynamic social, cultural, and spiritual significance to the community.

Cemeteries at Dalmore, Bragar, and Barvas serve as vital places of burial and spiritual practice. Instead of acknowledging their ongoing use and importance, the assessment misclassifies them as static features, overlooking the impact that development could have on their surroundings. This incorrect interpretation leads to a partial understanding of cultural effects and dismisses their integral role in community life.

Moreover, the evaluation overlooks intangible cultural heritage, such as the Gaelic language and traditions that define the area's identity. These essential elements are conspicuously absent from the assessment, resulting in a critical oversight. Without addressing these factors, the true cultural implications of the development cannot be accurately gauged.

Community rights and engagement also raise concerns. The Gaelic-speaking population maintains a distinct cultural identity, characterised as an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of

genuine engagement questions the assessment's validity and ignores established principles of participation regarding cultural and environmental issues.

Additionally, there is a notable procedural failure due to the absence of an Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. This missing evaluation prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering the determination unlawful.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, demonstrates a clear divergence from policy expectations.

Overall, the disregard for living heritage, intangible cultural values, community rights, and legal obligations culminates in a significant evidential gap. The cultural impacts of the proposed development remain inadequately assessed, leaving the application without a solid foundation for understanding the true cultural costs involved.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of health, wellbeing, and social impacts related to this development is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer initiated a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This failure creates a significant evidential gap, hindering both public understanding and the competent authority's ability to assess the complete range of social risks identified by the developer's own research.

Available summaries suggest that local residents are already experiencing considerable stress, anxiety, and concern due to the scale and proximity of the proposal. These observations stem from direct engagement and are not mere speculation. The decision to withhold the full assessment restricts proper scrutiny of the findings and diminishes the capacity to evaluate their importance in the decision-making process.

Furthermore, there is evidence that the proposal threatens community identity and cohesion, with the developer's own findings noting "cultural loss." Despite this, such impacts have not been adequately incorporated into the main application or assigned appropriate weight. By not disclosing the complete Social Impact Assessment, the developer obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when they may influence community character and functioning. The failure to provide the full dataset means that the

application does not offer a complete evidential basis for assessing the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm, yet existing evidence points to adverse effects that have not been fully revealed. Without the complete assessment, adherence to this policy cannot be substantiated.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material omission in the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment regime.

Ultimately, the failure to disclose the full Social Impact Assessment, along with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the view that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts is insufficient and does not adequately capture the extent of change or the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon, a lack of development, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would lead to a continuous and overpowering industrial presence, significantly altering this character and resulting in a permanent and irreversible change to the landscape.

The application fails to properly convey the magnitude of the visual alteration. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the level of impact or its importance within the context of such a sensitive landscape.

There are significant concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, calling into question the reliability of the assessment.

Another critical shortcoming is the lack of an evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated within

a broader landscape context linked by visual and spatial connections to the Atlantic horizon. The assessment treats these as standalone entities instead of recognising their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and disconnecting them from the natural horizon. This signifies not merely a visual impact but a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal stands in direct opposition to National Planning Framework 4, which concerns the protection of natural spaces and historic assets. The extent of change contradicts the obligation 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 impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting change is thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment inadequately represents the magnitude of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the argument that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, the assessment of construction and pollution risks is incomplete, lacking the necessary detail to evaluate likely environmental effects. The application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that would be prepared after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures raises serious concerns, particularly given the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and important habitats that are at risk from sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it 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 ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to

potential effects on marine species and habitats identified as sensitive within the broader assessment.

Additionally, the absence of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning to a post-consent stage, the application impedes the evaluation of whether appropriate 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 standpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation be assessed prior to consent, and the lack of such information renders a lawful determination impossible. The application also fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application presents significant deficiencies in its assessment of fisheries and marine life, failing to offer a robust evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these uses and habitats can be safeguarded or maintained without considerable disruption.

A critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to confirm that alternative fishing grounds are not only available but also accessible and capable of bearing additional pressures. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. Consequently, without a clear and evidence-based assessment, understanding the impacts on fisheries and local livelihoods is impossible.

Moreover, the proposal poses considerable risks to marine species, especially through the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over large distances, notably affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population is alarming; yet, the application minimises these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

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

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

In summary, the absence of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies ultimately render the assessment incomplete and unreliable. These shortcomings prevent any meaningful evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents a fragmented assessment of onshore infrastructure, failing to acknowledge the interconnected nature of the offshore turbines and onshore works. This separation obscures the complete environmental and socio-economic impacts that arise from what is fundamentally a single integrated project. The onshore components involve significant activities, including cabling across protected moorland and the construction of a substation near Stornoway, alongside access infrastructure through sensitive landscapes. Notably, excavation will occur in areas of deep peat, particularly within Barvas Moor, which is a critical carbon store and ecologically sensitive habitat. The current application lacks a thorough examination of these effects, leading to an incomplete understanding of the overall environmental footprint of the project.

By choosing to exclude or delay the assessment of onshore impacts, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project be considered together. However, the disjointed treatment of offshore and onshore elements means that the combined implications for peatlands, habitats, and local communities remain unclear.

Moreover, there are considerable risks to sensitive habitats such as machair systems and peatland environments, which enjoy policy protection. The application does not sufficiently demonstrate that impacts on these vital ecosystems have been adequately

assessed or that effective avoidance measures have been put in place, revealing a significant gap in evidence concerning biodiversity protection.

Concerns are also raised regarding the carbon balance associated with the proposal. The disturbance of peatland releases stored carbon, which could result in a carbon debt that contradicts the renewable energy development objectives. The application fails to address this matter adequately or to show that the overall carbon balance is indeed beneficial.

The routing of infrastructure through active croft land introduces further potential conflicts with established land use and legal rights. There is no evidence presented that the requisite consents or processes have been initiated, casting doubt on both the deliverability and lawful implementation of the project.

From a policy standpoint, the lack of a comprehensive assessment and failure to demonstrate the protection of peatlands, habitats, and land use interests stand in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated fundamentally weakens the application.

In summary, the division of project components, absence of thorough assessment, and lack of evidence concerning environmental and land use impacts culminate in an application that is incomplete and unreliable, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. However, the assessment of dark skies and nocturnal wildlife is completely missing from the Environmental Impact Assessment, creating a significant omission. The proposed development introduces permanent red aviation lighting, which would be visible over long distances and create an intrusive "wall of light" effect along the western horizon. This would fundamentally alter the night-time environment.

Moreover, there has been no evaluation of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of consideration is alarming, especially given the importance of dark skies to the area's identity and the growth of tourism sectors such as astro-tourism. The failure to address these impacts leads to a substantial gap in the overall assessment of landscape and environmental effects.

Even more concerning is the absence of an evaluation of impacts on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can result in disorientation and a higher risk of collision. The application lacks any lighting impact assessment or phototaxis study, failing to evaluate how the aviation lighting might affect these species

or contribute to increased mortality rates.

This issue is further exacerbated by the reliance on daytime survey data for the ornithological assessment, which overlooks nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been taken into account. The lack of site-specific night-time data represents a critical deficiency in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The necessary evidential standard required to rule out negative effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and hindering lawful decision-making.

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

Collectively, the absence of any assessment concerning dark skies and nocturnal wildlife forms a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis makes the application incomplete and unsuitable for supporting a lawful determination.

TOURISM

The Isle of Lewis sees tourism as a critical component of its economy, with the sector having expanded from £65 million in 2017 to over £81.5 million, providing more than 1,000 jobs and constituting up to 16% of the local economy. Despite the significance of this industry, the assessment of tourism impacts within the application is inadequate, particularly regarding the social and economic consequences for this key sector. It is noted that 86% of visitors are attracted by the area's scenic beauty, yet there is no quantifiable analysis of how the introduction of large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Furthermore, the assessment overlooks the crucial relationship between environmental quality and tourism, disregarding how unspoiled landscapes and dark skies enhance visitor experiences and appeal to growing markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortfall, creating a substantial gap in understanding the impacts on an increasingly important segment of the local economy.

The implications of this oversight are considerable, especially for an island community that relies heavily on tourism due to limited economic diversification. The failure to evaluate tourism impacts carries broader consequences for employment, local businesses, and the sustainability of the community. Notably, the absence of a

compliant Island Communities Impact Assessment means these economic vulnerabilities have not been properly assessed, as mandated under the Islands (Scotland) Act 2018.

On a policy level, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the requirement for a net benefit. It also contradicts strategic objectives that prioritise tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposed development.

The cumulative effect of not quantifying tourism impacts, neglecting the environmental factors that influence visitor behaviour, and overlooking the island's economic dependency results in a significant evidential gap. This deficiency hampers a thorough evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined in statutory duties, national policy, and evidential standards. It mirrors the central issues that led to the 2008 rejection of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This new application is presented within a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant gaps in the evidential basis necessary for proper determination of the application. The use of an undefined design envelope, reliance on unspecified mitigation measures, and the absence of crucial impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism, have resulted in an incomplete Environmental Impact Assessment. This inadequacy hinders a comprehensive understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to provide a complete Social Impact Assessment represents a serious omission that prevents the competent authority from evaluating the effects on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unfit for determination.

The proposal is at odds with the National Planning Framework 4, failing to prove the protection of biodiversity, natural spaces, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to missing tourism impact modelling. The cumulative effects of offshore and onshore components have not been adequately assessed, obscuring their implications for peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Evaluations of marine ecology, seabirds, protected species, and marine mammals remain incomplete and inconsistent in places. The evidence presented does not meet the threshold required to eliminate adverse effects beyond reasonable scientific doubt, thus engaging the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

Overall, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, policy conflicts, and unresolved environmental risks obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to request the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: EDA561D3

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 presents significant deficiencies that compromise its reliability and transparency regarding the environmental effects of the proposed development. The flexible Project Design Envelope employed, lacking concrete turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the integrity of the assessment and obscures the true environmental impacts, preventing both the public and the competent authority from fully understanding the proposal's consequences.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that are yet to be defined. Seeking consent under the premise that environmental harm will be addressed at a later stage hinders any meaningful evaluation of their effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unsound and contradicts the aims of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established prior to any determination.

The report also suffers from considerable evidential shortcomings, including gaps in baseline data and methodological limitations, leading to a reliance on assumptions rather than site-specific evidence. Consequently, there is uncertainty surrounding the scale and significance of impacts, particularly where negligible or non-significant effects are concluded without robust supporting data. This lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing a scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This raises concerns under the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot substantiate that impacts have been thoroughly assessed or that appropriate safeguards exist.

In summary, the combination of an undefined design envelope, unspecified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies inhibit a lawful and thorough assessment of environmental effects, placing the competent authority in a position where it cannot adequately evaluate the application based on the provided information.

ASSESSMENT OF ALTERNATIVES

The proposal does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured comparison of realistic alternatives based on environmental impacts, the application provides a narrative of the project's development. This approach does not demonstrate that less harmful options have been properly identified, evaluated, and chosen over more damaging solutions.

There is a notable lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the developer has genuinely considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The sensitivity of the West Lewis coastline and the critical significance of proximity to shore in assessing impact mean that the absence of such analysis precludes any conclusion that the proposed siting is the least damaging option.

Furthermore, the deficiencies are evident in the evaluation of cable routing and landfall assessment, with insufficient evidence indicating that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis suggests that mitigation by design has not been applied, resulting in an overreliance on post-design mitigation measures.

Consequently, the application fails to demonstrate that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This represents a significant departure from the established mitigation hierarchy, preventing the competent authority from determining whether less harmful and more suitable alternatives exist. A robust assessment of alternatives is essential to conclude that the proposal is sustainable and aligns with relevant policies.

From a policy standpoint, this inadequacy undermines compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a critical omission that leads to the overall conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a severely inadequate assessment of marine ecology and protected species within the West Lewis coastal environment, which is both highly sensitive and biologically active. The baseline data provided is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, there is a lack of a reliable evidential basis to evaluate potential impacts.

One significant oversight is the treatment of otters, classified as a European Protected Species. The application does not appropriately recognise their use of coastal areas for foraging and movement. By neglecting to consider their core foraging range and behavioural patterns, it fails to properly assess the potential impacts from construction disturbances, noise, and increased activity. This oversight undermines the conclusions drawn regarding the lack of significant effects on this species.

Additional concerns arise with the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that show frequent use of these waters. The exclusion or inadequate consideration of such vital data leads to an incomplete baseline, further weakening the reliability of the conclusions made.

These methodological flaws mean that the assertions of negligible or non-significant effects are founded 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 situation creates uncertainty about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not satisfy the criteria outlined in the Environmental Impact Assessment regime or the National Planning Framework 4, as the identification and assessment of protected species have not been conducted properly. The level of uncertainty involved precludes the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development on the west coast of the Isle of Lewis is critically flawed, exhibiting substantial gaps in evidence and internal contradictions that undermine its findings. This area is home to internationally significant seabird populations, many of which are already in decline. However, the application fails to adequately demonstrate that these species will not be negatively impacted. The development is situated within key foraging areas and migratory routes, yet the assessment does not thoroughly consider the risks of displacement, collision, or habitat loss.

A major inconsistency arises within the application, as the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is typically necessary only when significant harm is anticipated. This contradiction raises serious doubts about the credibility of the assessment and suggests that its conclusions lack support from the underlying evidence.

Furthermore, the assessment does not sufficiently establish that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The critical importance of these feeding grounds is insufficiently addressed, and reliance on

modelling approaches introduces uncertainty, particularly concerning species like Kittiwakes and Fulmars that are in severe decline. The methodologies used are likely to underestimate mortality rates, particularly due to incomplete baseline data and an inadequate understanding of behavioural responses.

The placement of turbines within a recognised migratory corridor poses an additional and significant risk by effectively obstructing a primary flight path for species migrating between the United Kingdom and Iceland. The application lacks a thorough assessment of the long-term consequences of sustained mortality in this corridor and its potential impacts on species with relatively small global populations.

Regulatory scrutiny reveals that the application does not satisfy the evidential requirements necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, along with gaps in data and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, thereby obstructing a lawful conclusion in favour of consent.

Overall, the identified deficiencies reflect a failure to adhere to National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to prove that internationally important seabird populations will not face adverse effects places the proposal in direct opposition to national policy. Collectively, these factors render the assessment unreliable, characterised by internal inconsistencies, methodological flaws, and a lack of sufficient evidence. Such shortcomings inhibit a thorough evaluation of impacts and lead to the conclusion that the application fails to meet the statutory requirements needed for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The cultural heritage assessment associated with this application is fundamentally flawed and overlooks the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising the ongoing social, cultural, and spiritual significance of heritage, the application takes a reductive stance, treating heritage as merely isolated, static assets.

Particularly concerning is the inadequate treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are actively used for burial and spiritual practices, yet the assessment wrongly categorises them as static features, neglecting their ongoing use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and ignores their importance in community life.

Moreover, the assessment fails to consider intangible cultural heritage, including the Gaelic language and traditions, along with the long-established relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely overlooked, representing a significant gap in

understanding the cultural impact of the development.

There are serious concerns regarding community rights and engagement as well. The Gaelic-speaking population, possessing a unique cultural identity recognised as characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement diminishes the credibility of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

Crucially, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, violating statutory requirements under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligation to evaluate the social, cultural, and economic repercussions on the island community, rendering any determination unlawful.

From a policy standpoint, these deficiencies place the proposal at odds with National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, indicates a clear deviation from policy stipulations.

In summation, the lack of evaluation regarding living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a significant evidential gap. The cultural ramifications of the development have not been adequately assessed, and the application lacks a robust foundation for appraising the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The full report of the Social Impact Assessment, commissioned by the developer, has not been published, resulting in a significant evidential gap. This omission hampers both public understanding and the competent authority's ability to grasp the extent of social risks identified by the developer's own research. Available summaries suggest that local 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 residents and are not speculative in nature. However, the lack of a complete assessment hinders proper scrutiny of these findings and limits the ability to evaluate their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with findings from the developer highlighting concerns over "cultural loss." Despite this recognition, these social impacts have not been adequately integrated into the main application nor given the weight they warrant. The failure to disclose the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency undermines the entire Environmental Impact Assessment

process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this scale, especially where community character and functioning are at risk. By not providing the comprehensive dataset, the application fails to present a complete evidential basis to assess the balance between benefits and harms.

From a policy perspective, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development should promote positive health outcomes and mitigate harm; however, the evidence currently available indicates existing adverse effects that have not been fully disclosed. Without the full assessment, it is impossible to demonstrate compliance with this policy.

The procedural implications of this non-disclosure are profound. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the complete Social Impact Assessment. This constitutes a material omission within the application and represents a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual, seascape, and landscape impacts is significantly lacking and does not sufficiently address the degree of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its expansive Atlantic horizon, undeveloped nature, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shore would create a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

Moreover, the application fails to adequately portray the extent of this visual change. The scale and proximity of the turbines are such that they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns also exist regarding the methodology used in selecting and presenting visual viewpoints. There is evidence to suggest that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly with respect to key cultural heritage sites and high-value landscapes. Consequently, there is a risk that the true extent of visual impact has been underestimated, which calls into question the credibility of the assessment.

Additionally, the assessment neglects to consider the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context that is visually and spatially linked to the Atlantic horizon. Rather than recognising these sites as interdependent, the assessment treats them as isolated entities, resulting in a partial evaluation of their setting and cultural importance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural places and historic assets. The scale of change proposed is at odds with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines claims of compliance with policy.

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

In summary, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interrelated nature of landscape and heritage. These shortcomings inhibit a trustworthy evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to disturbance and contamination. The proposed development involves significant seabed preparation and installation works in a challenging Atlantic environment. However, the assessment of construction and pollution risks lacks the necessary detail to effectively evaluate potential environmental impacts. There are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included with the application. Instead, it relies on mitigation and contingency measures that will be developed after consent is granted, which undermines any meaningful assessment of their effectiveness or adequacy.

This reliance on unspecified future measures is particularly alarming given the fragile nature of the receiving environment. The application notes the risks associated with sediment mobilisation and accidental chemical or oil spills but fails to detail how these risks 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. Without reliable modelling and clearly defined

management strategies, it is impossible to determine the extent, duration, or ecological effects of these potential impacts, including those on already identified sensitive marine species and habitats.

Moreover, the absence of well-defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application hinders the evaluation of whether adequate safeguards are in place to address pollution incidents. This introduces procedural risks and limits the ability of the competent authority to properly assess environmental protection measures before a decision is made.

From a regulatory standpoint, the failure to establish essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment framework. Significant effects and necessary mitigation must be evaluated before consent is granted, and the absence of such information prevents a lawful determination. 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, detailed management plans, and certainty regarding potential impacts results in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment of the application is fraught with significant deficiencies that directly impact marine ecosystems and local fishing industries. There is an alarming lack of a thorough evaluation regarding the ecological and socio-economic impacts on the diverse marine life and active fishing operations off the West Lewis coast. The assumption that fishing activities can be displaced without repercussions is particularly concerning. No evidence is presented to indicate the availability or accessibility of alternative fishing grounds, nor is there any indication that these grounds could support the additional fishing pressure, raising the risk of overfishing elsewhere and jeopardising the local fleet's economic stability.

Moreover, the proposal poses considerable risks to marine species, especially from the underwater noise created during construction. The anticipated high-energy hammer piling is likely to cause extensive disturbance, potentially affecting a significant portion of the local bottlenose dolphin population. Despite the gravity of these predictions, the application downplays the severity of such impacts, lacking sufficient supporting evidence.

Additionally, the application contains an internal inconsistency that warrants immediate scrutiny. While it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction not only undermines the credibility of the entire assessment but also raises serious questions about compliance with the Habitats

Regulations, particularly when anticipated harm demands legal authorisation.

The failure to assess cumulative impacts is another critical shortfall. The assessment does not adequately consider the combined effects of habitat disturbance, noise pollution, and the displacement of fishing activities. This omission severely hampers the ability to ascertain the overall implications for marine ecosystems and the socio-economic conditions of the area.

From a policy perspective, there is a clear non-compliance with both the National Planning Framework 4 and the National Marine Plan. The application does not demonstrate that the proposed development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus undermining the conclusion of sustainable development.

In summary, the myriad of deficiencies in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the contradictions within the application collectively render the assessment incomplete and unreliable. These shortcomings hinder a proper evaluation of the impacts on fisheries and marine life, necessitating immediate action to address these critical issues.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The evaluation of the onshore infrastructure is critically deficient, failing to address the comprehensive impacts arising from what constitutes a single cohesive project. The offshore turbines and their associated onshore works are fundamentally interconnected; however, they are being assessed in isolation. This fragmented methodology obscures the true magnitude of the environmental and socio-economic consequences.

The onshore components encompass cabling through protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure traversing sensitive landscapes. Excavation activities will occur in areas of deep peat, particularly within Barvas Moor, a vital carbon reservoir and ecologically delicate habitat. The application neglects to furnish a thorough assessment of these impacts, thus hindering a complete understanding of the project's overall environmental footprint.

Furthermore, by omitting or postponing the evaluation of onshore impacts, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project must be considered collectively. Yet, the division between offshore and onshore elements means the combined repercussions on peatlands, habitats, and local communities remain inadequately understood.

There are substantial risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy measures. The application fails to prove that impacts on these vital habitats have been thoroughly assessed or

that suitable avoidance strategies have been implemented. This leads to a significant evidential gap concerning biodiversity protection.

The proposal also raises serious concerns about carbon balance. Disturbing peatland has the potential to release stored carbon, thus creating a carbon debt that is at odds with the goals of renewable energy development. The application does not satisfactorily address this matter nor does it demonstrate that the overall carbon balance is maintained as beneficial.

Additionally, routing infrastructure through active croft land raises possible conflicts with established land use and legal rights. The application lacks evidence showing that the required consents or processes have been commenced, casting doubt on the project's viability and legal execution.

From a policy standpoint, the failure to assess the project comprehensively and to ensure 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 establish that adverse impacts can be avoided or mitigated further weakens the application.

Collectively, the disjunction of project components, the absence of thorough assessment, and the lack of substantiation regarding environmental and land use impacts render this segment of the application incomplete and untrustworthy, thereby obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of evaluation concerning nocturnal wildlife and dark skies within the Environmental Impact Assessment is a significant oversight that warrants urgent attention. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's environmental quality, cultural identity, and tourism appeal. The introduction of permanent red aviation lighting will create a long-reaching and intrusive "wall of light" effect across the western horizon, thereby fundamentally transforming the night-time environment.

Moreover, the application fails to assess how this lighting will impact visual amenity, landscape character, and the experiences of residents and visitors. This neglect is particularly concerning as dark skies play a crucial role in the identity of the area and in emerging tourism sectors, such as astro-tourism. Consequently, the failure to address these impacts represents a significant gap in the overall landscape and environmental assessment.

Equally alarming is the absence of an evaluation regarding the effects on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting, which can lead to disorientation and a higher risk of collisions. The application does not provide any assessment of lighting impacts or a phototaxis study, thus neglecting the potential consequences of aviation

lighting on these species and the likelihood of increased mortality.

This issue is exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to capture night-time activity and associated risks. Other species, including Kittiwakes, may forage or migrate during the night and are similarly at risk of disorientation from artificial light, yet this threat remains unassessed. The absence of site-specific night-time data results in a critical deficiency in understanding the ecological impacts.

Without a thorough examination of nocturnal effects, it is impossible to ascertain whether protected species or designated sites might suffer adverse consequences. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, this omission is at odds with the National Planning Framework 4, which aims to protect natural places and environmental quality. Furthermore, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

Taken as a whole, the failure to assess dark skies and nocturnal wildlife creates a substantial evidential gap. The lack of baseline data, impact modelling, and species-specific analysis leaves the application incomplete and unable to support a lawful determination.

TOURISM

The 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 represents a serious failure to meet the principles of sustainable development as required by statutory duties and national policy. This application revisits the fundamental issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which was rejected due to its unacceptable scale of industrialisation. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it remains inadequate.

Significant gaps exist in the evidential foundation necessary for proper determination. The use of an undefined design envelope is problematic, and there is a reliance on unspecified mitigation measures. Notably, the application overlooks critical impact pathways, including those affecting nocturnal wildlife, the complete scope of onshore infrastructure, and potential tourism effects. Consequently, the Environmental Impact Assessment falls short, hindering a comprehensive understanding of likely significant effects and residual impacts.

Moreover, procedural failures are evident. The lack of a compliant Island Communities Impact Assessment contravenes the Islands (Scotland) Act 2018, and the absence of a full Social Impact Assessment is a material omission. These shortcomings inhibit the competent authority from fully evaluating the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

The proposal also directly contradicts National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural environments, and cultural heritage. It does not provide evidence that health and wellbeing impacts are acceptable nor does it establish a net economic benefit, as it lacks tourism impact modelling. Additionally, the cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination regarding acceptable impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The combination of significant information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm proposal be entirely refused.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 29302075

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The proposal is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, nearly untouched environment, and rich cultural heritage. Concerns about the scale, proximity, and design of the development raise questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The documentation provided fails to supply a sufficient evidential foundation for a lawful assessment. There are significant gaps in critical environmental data, with baseline information being both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework utilised does not facilitate a clear understanding of potential significant effects, and reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, there is no comprehensive understanding of the environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

There are notable and serious conflicts with established policy. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national obligations to protect biodiversity, climate interests, and overall environmental integrity. These issues challenge the statutory tests required for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The unprecedented scale of this proposal in the area, with substantial turbines situated near the shoreline, raises significant worries about landscape capacity, visual impact, and broader environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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 application lacks a proper assessment of alternatives, which is crucial for compliance with the Environmental Impact Assessment regime. Instead of delivering a clear and reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of the project's evolution. This method neglects to show that less harmful options have been thoroughly identified, evaluated, and chosen over more damaging solutions.

Furthermore, there is a distinct absence of transparent, evidence-based comparisons

of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has genuinely considered positioning turbines further offshore, which could potentially lessen visual, ecological, and coastal impacts. Given the delicate nature of the West Lewis coastline and the critical role that proximity to shore plays in assessing impact, the lack of such analysis hinders any conclusion that the proposed siting is indeed the least harmful option.

Additionally, the issues extend to the evaluation of cable routing and landfall assessments. There is a lack of sufficient evidence showing that alternative routes have been adequately investigated to avoid or mitigate impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The failure to provide a clear avoidance strategy, combined with the absence of comparative analysis, signifies that mitigation through design has not been employed, relying instead on measures that would be implemented after design.

Consequently, the application does not demonstrate that environmental harm has been minimized through appropriate site selection, layout, and infrastructure routing. This represents a disregard for the established mitigation hierarchy and obstructs the competent authority from determining whether less harmful and more suitable alternatives exist. In the absence of a rigorous assessment of alternatives, it is impossible to assert that the proposal aligns with sustainable or policy-compliant solutions.

From a policy standpoint, this shortcoming undermines adherence to National Planning Framework 4, especially in terms of safeguarding natural areas, cultural heritage, and community wellbeing. The lack of a systematic and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species lacks sufficient depth and fails to provide a comprehensive or reliable insight into the ecological receptors within the West Lewis coastal environment. This region is a biologically active and sensitive marine ecosystem, yet the baseline data presented is insufficient, and the methodologies employed do not adequately capture the presence, behaviour, or habitat use of key species. Consequently, the assessment does not yield a strong evidential basis for evaluating potential impacts.

One significant gap in the assessment concerns otters, a European Protected Species. The application does not adequately acknowledge or evaluate their active utilisation of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an inadequate assessment of the potential impacts arising from construction disturbance, noise, and heightened activity levels. This omission weakens any conclusions regarding the absence of significant effects on otters.

Additionally, the assessment of basking sharks reveals further shortcomings, as the reliance on aerial surveys introduces notable detection bias, especially in Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or sufficiently consider such data results in an incomplete baseline, diminishing the reliability of the conclusions drawn.

These methodological issues mean that assertions of negligible or non-significant effects are primarily based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates ambiguity regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to appropriately identify or assess protected species. The uncertainty introduced by these shortcomings prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these factors, consent cannot be granted lawfully.

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, leading to the conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies undermine the ornithological assessment, casting doubt on the reliability of its conclusions. The presence of contradictory findings raises questions, particularly given that a Habitats Regulations derogation case is only necessary where significant harm is anticipated. This inconsistency suggests that the assessment does not provide adequate support for 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. Critical foraging areas and migratory pathways are located within the development site, yet the assessment fails to robustly evaluate the potential implications of displacement, collision risk, or habitat loss. Furthermore, the assessment does not adequately address the importance of feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda. The reliance on modelling approaches introduces uncertainty, particularly for species such as Kittiwakes and Fulmars, which are in severe decline.

The siting of turbines within a recognised migratory corridor presents an additional significant risk, creating a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations.

These 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 remain unaffected places the proposal in direct conflict with national policy.

Taken together, the shortcomings in the assessment—marked by internal inconsistency, methodological weaknesses, and insufficient evidence—prevent a thorough evaluation of impacts and lead to the overall conclusion that the application does not meet the statutory requirements necessary for determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in support of consent.

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties and national policy. It echoes the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite now being framed within a more robust policy context that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application has not satisfactorily addressed these issues.

Critical gaps are evident in the evidential basis provided for assessment. The use of an undefined design envelope is troubling, and the application relies on unspecified mitigation measures while omitting essential impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment lacks completeness, which hinders a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also apparent. Notably, the absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment signifies a substantial omission. These inadequacies inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, ultimately rendering the application unsuitable for determination.

The proposal conflicts with the National Planning Framework 4. It does not adequately

protect biodiversity, natural areas, and cultural heritage, nor does it demonstrate that health and wellbeing effects are acceptable. The absence of tourism impact modelling further clouds the assertion of net economic benefit. Moreover, there has been insufficient assessment of the cumulative impacts from both offshore and onshore components, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Significant and irreversible alterations to a highly sensitive landscape would also arise from this proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and repercussions on tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively unfit for determination. The considerable deficiencies in information, coupled with policy conflicts and unresolved environmental risks, impede 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.

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: 32BB7765

