

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 proposal is fundamentally flawed due to the deficiencies within the Environmental Impact Assessment Report, which lacks a complete, transparent, and reliable evaluation of its likely environmental effects. Central to this issue is the adoption of a flexible Project Design Envelope, which does not commit to specific turbine

dimensions, layouts, or configurations. This uncertainty hampers a consistent application of a worst-case scenario, compromising the assessment's integrity and leaving both the public and the competent authority uninformed about the true extent of the environmental impacts that may arise from the development.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the premise that potential environmental harm will be resolved later is unacceptable, as it undermines any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. Such deferral of critical information to post-consent stages contradicts the foundational principles of the Environmental Impact Assessment regime, which mandates that significant effects and appropriate mitigations must be established clearly before determination.

Additionally, the report exhibits significant evidential shortcomings, including gaps in baseline data, limitations in methodology, and a tendency to rely on assumptions rather than site-specific evidence. This results in ambiguity regarding the scale and significance of potential impacts, particularly when conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information obscures the understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

Consequently, the application does not meet the evidential standard set by the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal fails to comply with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot demonstrate that impacts have been fully assessed or that suitable safeguards are in place.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation, and significant gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings obstruct a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is incomplete and does not give a reliable understanding of ecological receptors in the West Lewis coastal area. This region is a sensitive and biologically rich marine environment, yet the baseline data is lacking, and the methods used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a solid evidential foundation for determining impacts.

A significant shortcoming involves otters, which are a European Protected Species. The

application does not adequately recognise or assess their use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that potential effects from construction disturbances, noise, and increased activity have not been thoroughly evaluated. This weakens any assertions made regarding the lack of significant effects on this species.

Further issues arise in the assessment of basking sharks. The reliance on aerial surveys creates a notable detection bias, especially under Atlantic conditions, likely leading to an underestimation of their presence. In contrast, established land-based observations indicate that these waters are frequently used by basking sharks. The failure to properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based more on assumptions than on strong evidence. The lack of sufficient baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the real risks 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 National Planning Framework 4, as protected species have not been adequately identified or assessed. This uncertainty means that adverse effects cannot be excluded beyond reasonable scientific doubt, activating the precautionary principle. Therefore, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development reveals significant flaws, undermining its credibility. There are substantial gaps in the evidence and internal inconsistencies that raise serious questions about its conclusions. The west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already declining. However, the application does not provide the necessary evidence to demonstrate that these species will not be adversely affected. The development site is situated within crucial foraging areas and migratory pathways, yet the assessment fails to thoroughly evaluate the risks of displacement, collision, or habitat loss.

A major contradiction arises within the application itself. The developer asserts that there will be no significant adverse effects, while also putting forth a Habitats Regulations derogation case, which is only relevant when significant harm is anticipated. This contradiction casts doubt on the reliability of the assessment and suggests that the conclusions drawn are not backed by adequate evidence. Furthermore, the assessment lacks sufficient proof that seabird species linked to

protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not adequately recognised, and the reliance on modelling methods introduces further uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is incomplete and behavioural responses are not fully considered.

The proposed siting of turbines within a recognised migratory corridor presents an additional and serious 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 consequences of ongoing mortality within this corridor or the potential impacts on species with relatively small global populations.

Regulatory concerns emerge as the application fails to meet the evidential threshold necessary to assert no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and modelling shortcomings, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and precludes a lawful conclusion in favour of consent.

Moreover, the deficiencies outlined represent a failure to comply with National Planning Framework 4 regarding the protection of biodiversity 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 opposition to national policy.

In summary, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence render it unreliable. These issues hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely flawed, overlooking the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interwoven. The application adopts a narrow perspective, treating heritage as a collection of separate, unchanging assets rather than recognising their ongoing social, cultural, and spiritual relevance to the community.

A significant shortcoming is evident in the handling of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and places of spiritual significance, yet the assessment erroneously classifies them as static entities, neglecting their current use, meaning, and the development's effects on their surroundings. This incorrect portrayal leads to an incomplete understanding of cultural impacts and disregards their vital role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship the community has with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the assessment, marking a significant gap. Without recognising these factors, the true cultural impact of the development remains inadequately understood.

There are also serious concerns regarding community rights and involvement. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

A critical procedural oversight is the failure to produce a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to examine the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings position the proposal in direct opposition to the National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The non-disclosure of the full Social Impact Assessment is a significant concern, as it directly undermines the integrity of the Environmental Impact Assessment process. Without this crucial document, it is impossible for the competent authority to conduct a thorough socio-economic and health evaluation. This omission represents a failure to meet the evidential requirements necessary for making an informed decision regarding the development.

Available summaries reveal that local residents are already experiencing measurable stress, anxiety, and concern stemming from the scale and proximity of the proposal. These findings, derived from direct engagement, are not speculative. However, the absence of the full assessment hinders proper scrutiny of these impacts, limiting the ability to assess their significance in the decision-making process.

Moreover, there is evidence indicating that the proposal threatens community identity

and cohesion. The developer's own findings highlight “cultural loss” as a consequence of the development. Despite this identification, such impacts have not been adequately integrated into the main application or considered appropriately. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with this development.

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4, particularly concerning health and wellbeing. Development should promote positive health outcomes and avoid harm, yet the evidence at hand suggests existing adverse effects that remain undisclosed. Consequently, without the full assessment, compliance with this crucial policy cannot be established.

The overall assessment of social impacts, health, and wellbeing is materially deficient and lacks the necessary transparency for a lawful evaluation. This significant evidential gap prevents both the public and the competent authority from understanding the full extent of the social risks identified through the developer’s own research. Taken together, 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 reinforces the conclusion that the application is unsupported by sufficient information for a lawful determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and fails to capture the true scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would establish a continuous and overwhelming industrial presence, drastically transforming this character and resulting in a permanent alteration of the landscape.

Moreover, the application does not effectively represent the extent of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to accurately convey the magnitude of this impact or its importance in the context of such a delicate landscape.

Methodological issues also arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This raises the risk that the extent of visual impact has been minimised, casting doubt on the reliability of the assessment.

A significant shortcoming lies in the lack of consideration of the interconnected

relationship between landscape, seascape, and cultural heritage. Locations such as the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape setting interconnected with the Atlantic horizon. The assessment treats these heritage sites in isolation, failing to acknowledge their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural importance.

The industrialisation of the seascape would sever these critical relationships, altering how heritage assets are perceived and disrupting their connection to the natural horizon. This signifies not merely a visual impact but a broader cultural and spatial detriment that has not been thoroughly assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly regarding the preservation of natural areas and historic assets. The scale of change is at odds with the necessity to protect landscape character, visual amenity, and the context of culturally significant sites. The absence of a robust worst-case assessment further weakens any assertion of policy compliance.

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

Collectively, these deficiencies in the assessment prevent an accurate representation of the impact scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. This leads to a conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on unspecified future measures is particularly troubling due to the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and possible chemical or oil spills, it fails to outline adequate strategies for their prevention, control, or monitoring.

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

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

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

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

FISHERIES AND MARINE LIFE

The application presents a range of significant deficiencies in its assessment of fisheries and marine life, failing to provide a thorough evaluation of both ecological and socio-economic impacts. It is critical to note that the waters off the West Lewis coast are home to a diverse marine ecosystem and a thriving fishing industry. However, the proposal does not adequately demonstrate that these vital habitats and economic activities can be safeguarded or sustained without facing severe disruption.

One major concern is the presumption that fishing activities can be shifted without any adverse effects. The application does not supply evidence that alternative fishing grounds exist, are accessible, or can accommodate the additional pressure from displaced activities. This gap is crucial, as such displacement could lead to overfishing in other areas, posing broader economic risks for the local fishing fleet. Without a comprehensive, evidence-based assessment, the consequences for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses substantial risks to marine species, especially due to underwater noise generated during the construction process. The use of high-energy hammer piling for an extended period could cause disturbances over considerable distances, impacting species such as dolphins. There are significant concerns

regarding the anticipated disturbance to a large proportion of the local bottlenose dolphin population, yet these potential impacts are significantly downplayed in the application, lacking adequate supporting evidence.

Additionally, there is a notable inconsistency within the application itself. While it acknowledges the need for licenses to permit harm to European Protected Species, it simultaneously characterises the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly in instances where harm is expected to a degree that necessitates legal authorisation.

The assessment also neglects to address cumulative impacts from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. A lack of a comprehensive evaluation of these combined effects means that the overall implications for marine ecosystems and socio-economic conditions remain indeterminate.

From a policy perspective, the application does not illustrate compliance with National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that this proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project lacks completeness, particularly in its consideration of onshore infrastructure impacts. This project, involving offshore turbines and onshore works, is an integrated proposal, yet it has been evaluated separately. This fragmented analysis obscures the true environmental and socio-economic effects.

The onshore aspects encompass cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure through sensitive landscapes. These operations will require excavation in areas of deep peat, especially within Barvas Moor, which is vital for carbon storage and is an ecologically sensitive habitat. The application fails to provide a thorough evaluation of these impacts, hindering a clear understanding of the overall environmental footprint of the project.

By not fully assessing the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered together. However, the division of offshore and onshore elements means that the combined impacts on

peatlands, habitats, and local communities are not completely understood.

Sensitive habitats, such as machair systems and peatland environments, face considerable risks and are protected by policy. The application does not show that the impacts on these habitats have been fully evaluated or that suitable avoidance measures are in place. This results in a significant evidential gap regarding biodiversity protection.

Concerns also arise regarding the carbon balance associated with the project. Disturbance of 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 concern or prove that the overall carbon balance remains positive.

Routing infrastructure through active croft land may lead to conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, raising doubts about the feasibility and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a whole, along with the failure to demonstrate 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 division of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts result in an incomplete and unreliable application, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline features exceptionally dark skies, which are integral to the area's environmental quality, cultural identity, and tourism potential. However, the proposal introduces permanent red aviation lighting that will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This significant change has not been evaluated in the Environmental Impact Assessment, which fails to consider the effects of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. Such omissions are particularly concerning given the area's reliance on dark skies, especially for emerging tourism sectors like astro-tourism.

Moreover, the lack of evaluation regarding impacts on nocturnal wildlife is alarming. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and a higher risk of collisions. The application does not provide a lighting impact assessment or a study of phototaxis, thus neglecting to address the potential effects of aviation lighting on these species and the risk of increased

mortality.

Additionally, the ornithological assessment is primarily based on daytime survey data, failing to account for nocturnal activity 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 assessed either. The absence of site-specific night-time data leaves a critical gap in understanding the ecological impacts.

Without a thorough assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing a lawful determination. Furthermore, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality, while also compromising the broader evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

TOURISM

The application neglects to properly assess the impacts on tourism, which is a vital component of the Isle of Lewis economy, and it fails to evaluate the economic and social consequences for this key sector. Tourism relies heavily on the island's wild coastline, nearly untouched landscapes, dark skies, and the sense of remoteness that attracts visitors. While the application states that 86% of tourists are drawn to the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or their overall economic contribution.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and contributing up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the wider economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect an established and expanding sector.

Furthermore, the assessment overlooks the importance of environmental quality to tourism, including the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortfall, creating a significant gap in understanding the potential impacts on a growing segment of the local economy.

In an island community that faces challenges regarding economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and the sustainability of communities. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently examined, contrary to the requirements outlined in the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, the failure to assess the environmental factors that influence visitor behaviour, and the disregard for the economic dependency of the island culminate in a substantial evidential gap. This inhibits a thorough evaluation of economic effects and reinforces the conclusion that the application is incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It revisits the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current proposal is presented under a supposedly stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it falls short in these areas.

Crucial gaps exist in the baseline data provided, alongside the use of an undefined design envelope and unspecified mitigation measures. The omission of key impact pathways, particularly concerning nocturnal wildlife, full onshore infrastructure, and tourism, further undermines the application. The Environmental Impact Assessment is incomplete, failing to allow for a comprehensive understanding of significant effects or residual impacts.

Procedural shortcomings are evident in the absence of a compliant Island Communities Impact Assessment, breaching the statutory duty established under the Islands (Scotland) Act 2018. Furthermore, the lack of a full Social Impact Assessment represents a critical omission. These failings hinder the competent authority's ability to properly assess the implications for community wellbeing, cultural identity, and economic resilience, thereby rendering the application unsuitable for determination.

In addition, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural

heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable, nor can it provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts from both offshore and onshore elements have not been adequately assessed, leaving concerns over effects on peatlands, carbon balance, habitats, and crofting land unaddressed.

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

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

In summary, the application is both procedurally and substantively unfit for determination. The multitude of information deficiencies, along with policy conflicts and unresolved environmental risks, obstruct any lawful, evidence-based decision. It is imperative that the competent authority refuse consent based on these grounds or invoke the necessary regulatory measures to mandate the submission of the missing information.

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

Additional Comments

For me personally, the thought of this development breaks my heart. Over the 20 years I have run a tour business operating successfully in the Highlands and Islands, I have watched as year by year more and more wind farms spring up. I have seen the land I love and proudly share with visitors from around the world, slowly being destroyed. The wild, beautiful scenery they travel from all corners of the earth to see is being turned into an industrial landscape and the comments they make on this is frankly embarrassing. I feel like I'm not able to show them 'real' Scotland anymore.

I relocated to Lewis to get away from the madness of the mainland, with spinning blades in every vista. And the nose to tail motor homes of the NC500. I needed open space and to be near the sea again. And now I find that even this beautiful, wild, haven for people and wildlife is not safe from the greed and green-washing of big business, only too happy to ruin the lives of the people who live here and destroy an amazing marine habitat just to line their own pockets.

This is the rape of natural environment by big business. Once it's gone, it's gone and we will have lost it forever.

I am absolutely disgusted that the local council are even considering this proposal, when the majority of people living here do not want it to go ahead. It stinks of

corruption....

I spent everything I had saved for years to live here and borrowed even more and now my property, as well as those of everyone else on the west and north coast will be devalued. I believe you will see a mass exodus from the west side, because the people who live there chose to live there because they love it. Who will want to live there when the view is just a huge mass of blades constantly turning.

The council have grossly underestimated the impact this will have on the mental health of local people, myself included. Just the thought of this development makes me depressed - heaven help us all if it goes ahead. I'm sure there will be a rise in the local suicide rate.

I Object to the Spiorad na Mara wind farm going ahead.

Please, please refuse this awful development permission to 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: 0E005F5C

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References: MD-00011742 & MD-00011743

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the appropriate marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its associated documents reveals significant planning, environmental, cultural, and procedural shortcomings. The development site is situated off the west coast of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine conditions, and strong cultural heritage. The nature, scale, and proximity of the proposed development raise serious concerns about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful determination. It is evident that crucial environmental data is absent, baseline information is both limited and inconsistent, and several vital aspects of the proposal remain undefined. The flexible design framework employed inhibits a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures raises concerns about their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsubstantiated by reliable evidence.

There are distinct and significant policy inconsistencies present. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and jeopardise the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the project is concerning, with large turbines positioned in close proximity to the shore, leading to significant worries about landscape capacity, visual impact, and environmental effects. Collectively, the deficiencies in information, reliance on undefined mitigation strategies, evidential gaps, and clear policy violations illustrate that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The deficiencies present in the Environmental Impact Assessment Report render it materially inadequate, as it fails to offer a full, transparent, or reliable overview of the

proposal's likely environmental effects. The employment of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces a considerable degree of uncertainty. This uncertainty obstructs the application of a worst-case scenario, thereby compromising the integrity of the assessment. Consequently, the impacts described may not correspond to the development that is ultimately realised, which in turn hinders both public understanding and the competent authority's ability to ascertain the true extent of environmental effects.

Moreover, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be addressed subsequently precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a deferral of crucial information to post-consent phases is procedurally unacceptable and conflicts with the core objectives of the Environmental Impact Assessment regime. This regime mandates that likely significant effects and mitigation strategies be clearly articulated prior to determination.

There are also considerable evidential shortcomings, including notable gaps in baseline data, methodological limitations, and a dependence on assumptions rather than site-specific evidence. This leads to uncertainties regarding the scale and significance of impacts, particularly where claims of negligible or non-significant effects are presented without robust supporting data. The insufficient information prevents an accurate understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainties that are irreconcilable with statutory obligations.

As a result, the application does not satisfy the evidential standards required under the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, specifically in relation to biodiversity protection and environmental integrity. It cannot be shown that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the reliance on an unspecified design envelope, the absence of clear mitigation measures, and the existing gaps in baseline data culminate in an Environmental Impact Assessment Report that is unreliable and incomplete. These shortcomings impede a lawful and thorough assessment of environmental effects and place the competent authority in a position where it cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This indicates a significant oversight in following the established mitigation hierarchy. Consequently, the competent authority is left without a clear understanding of whether less harmful

and more suitable alternatives could be viable. The assessment of alternatives is fundamentally inadequate and does not fulfil the statutory requirements set by the Environmental Impact Assessment regime. Instead of delivering a structured, reasoned comparison of feasible alternatives based on their environmental impacts, the application merely offers a narrative of project development. This flawed approach does not adequately illustrate that less damaging options have been effectively identified, evaluated, and preferred over more harmful solutions.

Moreover, the application provides no transparent, evidence-based comparison of different offshore locations, scales of development, or design configurations. Notably, it fails to show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, means that the lack of such analysis makes it impossible to ascertain that the proposed siting is the least damaging option available.

The shortcomings are also apparent in the evaluation of cable routing and landfall assessment, which lack sufficient evidence that alternative routes have been explored to minimise impacts on sensitive receptors. This oversight includes locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the failure to conduct comparative analysis suggest that mitigation by design has not been considered, leading to reliance on measures that would come after the design phase.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, reinforcing the overall conclusion that the application has not been sufficiently assessed and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The West Lewis coastal environment is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is materially deficient. There is a lack of complete and reliable understanding of ecological receptors, as the baseline data remains incomplete and the methodologies employed fail to adequately capture species presence, behaviour, and habitat use. Consequently, the assessment does not provide a sound evidential basis for evaluating impacts.

A significant shortcoming in this assessment is its failure to properly recognise and assess the active use of coastal areas by otters, a European Protected Species, for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the potential effects of construction disturbance, noise, and increased activity are inadequately evaluated. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

The assessment also falls short in addressing basking sharks, where reliance on aerial

surveys leads to substantial detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider such data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological limitations mean that any conclusions of negligible or non-significant effects are based on assumptions rather than robust evidence. The absence of sufficient baseline data hinders meaningful assessment of cumulative and indirect impacts, including seasonal variation and wider ecosystem interactions, creating uncertainty about the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not meet the requirements of the Environmental Impact Assessment regime or the National Planning Framework 4, as protected species have not been appropriately identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In these circumstances, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed and raises serious concerns among the local community. The west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are already in decline. However, the application fails to provide the necessary evidence to show that these species will not face adverse effects as a result of the development. Key foraging areas and migratory pathways have not been adequately evaluated, with significant gaps in the analysis regarding displacement, collision risk, and habitat loss.

Moreover, the application contains a critical contradiction. The developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency undermines the reliability of the assessment, suggesting that the conclusions drawn are not substantiated by the evidence presented.

Additionally, there is insufficient evidence regarding the impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully recognised, and the reliance on modelling approaches raises uncertainties, particularly concerning species like Kittiwakes and Fulmars that are already experiencing severe decline. The methodologies employed are likely to

underestimate mortality rates, especially given the incomplete baseline data and the lack of understanding regarding behavioural responses.

The placement of turbines within a recognised migratory corridor creates a significant risk, effectively establishing a barrier along a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, as well as the potential consequences for species with small global populations, have not been thoroughly assessed.

From a regulatory standpoint, the application does not meet the required evidential threshold to determine 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 achieved. This situation invokes the precautionary principle and renders a lawful conclusion in favour of consent unattainable.

The identified deficiencies highlight a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places this proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal inconsistencies, methodological weaknesses, and lack of sufficient evidence. These issues hinder a robust evaluation of impacts and collectively suggest 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 in the application is fundamentally flawed. It fails to recognise the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are intricately linked. Instead, the assessment takes a narrow approach, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance to the community.

One significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These are active sites of burial and spiritual practice, yet the assessment categorises them as unchanging features, neglecting their ongoing use, significance, and how development could affect their surroundings. This mischaracterisation leads to an incomplete understanding of cultural impacts and overlooks the cemeteries' roles within community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are central to the region's identity and are conspicuously absent from the assessment, which is a considerable oversight. The cultural impact of the development remains inadequately understood without these

considerations.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity, akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to recognised principles of participation in decisions that impact cultural and environmental interests.

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

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to recognise both tangible and intangible heritage, alongside living cultural practices, clearly deviates from policy requirements.

Overall, the neglect of living heritage, intangible cultural value, community rights, and legal obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, and the application lacks a solid foundation for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing, which have not been adequately addressed. A Social Impact Assessment was commissioned by the developer, including engagement with local residents through focus groups. However, the full report has not been made available, leading to a significant evidential gap that hinders both the public's understanding and the competent authority's ability to fully grasp the social risks identified by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern related to the scale and proximity of the proposal, as indicated in available summaries. These effects stem from direct engagement with the community and are therefore based on real experiences rather than speculation. The failure to disclose the complete assessment restricts proper scrutiny of these findings and affects the evaluation of their importance in the decision-making process.

Additionally, the proposal has been viewed as a threat to community identity and cohesion, with a noted risk of "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment conceals the true

human and social costs associated with the development.

This deficiency in disclosure compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health implications is crucial, especially when community character and functionality may be impacted. The absence of the complete dataset means that the application lacks a comprehensive evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the available evidence suggests existing negative effects that have not been fully revealed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential requirements established by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of pre-existing adverse effects, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline represents a significant alteration to the existing environment, which is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. This change would result in a continuous and dominant industrial presence that fundamentally transforms the character of the landscape. The assessment fails to adequately represent the magnitude of this visual change, which will overshadow views from residential areas, historic sites, and popular coastal locations. Consequently, this would directly impact visual amenity, undermining the defining qualities of naturalness and remoteness.

Methodological concerns arise regarding the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, diminishing its reliability.

Moreover, there is a significant deficiency in the failure to assess the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader

landscape setting linked by visual and spatial relationships to the Atlantic horizon. The assessment regards these sites as isolated entities, neglecting their interdependence and leading to an incomplete evaluation of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the safeguarding of natural spaces and historic assets. The proposed scale of change is incompatible with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a comprehensive worst-case assessment further undermines any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The application presents significant deficiencies in the assessment of construction and pollution risks, lacking the necessary detail to properly evaluate potential environmental impacts. It proposes extensive seabed preparation and installation works in a high-energy Atlantic environment without providing fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on the preparation of mitigation and contingency measures after consent has been granted, which obstructs any substantial assessment of their adequacy or effectiveness.

This approach raises particular concerns given the sensitivity of the receiving environment along the West Lewis coastline, which is home to clean coastal waters and vital habitats susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to detail how these risks will be effectively prevented, controlled, or monitored.

Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation activities. In the

absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological impacts of such disturbances. This uncertainty also pertains to the potential effects on marine species and habitats identified as sensitive in the broader assessment.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent stage, the application undermines the ability to assess whether appropriate safeguards are established to address pollution events. This situation introduces procedural risk and hinders the competent authority's capacity to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements set forth in the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation strategies be assessed prior to consent, and any absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast support a diverse marine ecosystem alongside an active fishing industry. However, the assessment of fisheries and marine life related to the proposal is inadequate, failing to provide a solid evaluation of the ecological and socio-economic impacts. The application does not establish that these vital uses and habitats can be protected or maintained without significant disruption.

A critical concern is the assumption that fishing activities can be displaced without repercussions. The application lacks evidence to demonstrate that alternative fishing grounds are available, accessible, or able to sustain additional pressure. This significant oversight raises the risk of overfishing in other areas and 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 unclear.

Moreover, the proposal poses considerable risks to marine species, particularly through the underwater noise generated during construction. Extended high-energy hammer piling is expected to cause disturbances across large distances, affecting species such as dolphins. The anticipated disruption to a substantial portion of the local bottlenose dolphin population is alarming, yet the application minimises the severity of these impacts, lacking adequate supporting evidence.

There is a notable inconsistency in the application regarding the need for licenses to permit harm to European Protected Species, which is acknowledged even while impacts are described as negligible. This contradiction undermines the credibility of the assessment and raises serious concerns about compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation.

Additionally, the assessment does not adequately address cumulative impacts from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential to determine the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not illustrate compliance with 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, making it impossible to conclude that the proposal represents sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected under policy. The application

fails to demonstrate that impacts on these critical habitats have been thoroughly assessed or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment concerning dark skies and nocturnal wildlife within the Environmental Impact Assessment represents a significant oversight. 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. The introduction of permanent red aviation lighting, which would be visible over considerable distances, threatens to create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

This application fails to evaluate the potential impacts 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 region's identity and the emerging sectors of tourism, such as astro-tourism. Consequently, there exists a notable gap in the overall landscape and environmental assessment due to these omissions.

Moreover, there has been no evaluation of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting, which can lead to disorientation and increased risk of collision. The application does not provide a lighting impact assessment or a phototaxis study, thereby neglecting to consider how aviation lighting may negatively affect these species or contribute to increased mortality rates.

This shortcoming is further aggravated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activity or related risks. Species such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting, yet this has not been addressed. The absence of site-specific night-time data results in a critical gap in understanding the ecological impacts that the proposal may have.

Without a thorough assessment of nocturnal impacts, it remains impossible to ascertain whether protected species or designated sites would experience adverse effects. The necessary evidential standard to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which invokes the precautionary principle and prevents a lawful determination of the application.

From a policy standpoint, the lack of evaluation contradicts National Planning Framework 4 regarding the preservation of natural environments and environmental quality. It also compromises the overall assessment of landscape and seascape impacts, as the character of night-time forms an essential part 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 unfit for supporting a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm does not meet the requirements for sustainable development. It fails to satisfy statutory duties, national policy, and evidential standards. This application presents the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Now, despite being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still falls short.

The application lacks a complete and reliable evidential basis for determination. There are significant gaps in the baseline data, an undefined design envelope, unspecified mitigation measures, and missing key impact pathways, including effects on nocturnal wildlife, full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is incomplete, preventing a clear understanding of likely significant effects or residual impacts.

Procedural failures are evident as well. The absence of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts with National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to a lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

There are uncertainties regarding environmental risks that could be significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and prevents a lawful conclusion that impacts are acceptable.

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

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

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

Additional Comments

I strongly object to the proposed offshore wind farm off the coast of the Isle of Lewis.

This island is a unique and beautiful place with uninterrupted views out to the Atlantic. To consider obstructing this view with what can only be described as immense wind turbines both large in size and quantity is an abomination.

The impact on wildlife, dark skies, ecology in this largely untouched part of the world appears to be totally unacceptable.

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: 59322BB7

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under marine licensing and Environmental Impact Assessment regulations. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, which reveals significant deficiencies in planning, environmental, cultural, and procedural aspects. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The dimensions and design of the project, alongside its proximity to the shore, raise serious questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not present a sufficient evidential basis to support a lawful determination. Essential environmental data is absent, baseline information is scarce and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework complicates the understanding of potential significant effects, and the reliance on unconfirmed mitigation measures renders their effectiveness unassessable. Consequently, the submitted documentation does not allow for a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There exist notable and serious policy conflicts. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It fails to establish that it can meet national obligations to safeguard biodiversity, climate priorities, and environmental integrity. These discrepancies directly affect the statutory assessments required for consent and hinder the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the project in this area, with substantial turbines placed in close proximity to the shoreline, raises significant concerns about landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy violations indicates that the application is incomplete and cannot sustain a lawful determination. Under these conditions, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species surrounding the West Lewis coastal environment is fundamentally inadequate. It fails to offer a thorough and reliable insight into the ecological receptors present in this sensitive marine ecosystem. The data collected is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment does not provide a solid evidential basis for understanding the potential impacts of the proposed activities.

One major shortcoming is the lack of proper recognition and assessment regarding otters, a species protected under European law. The application does not adequately account for their active use of coastal areas for foraging and movement, which is critical for understanding the potential impacts of construction disturbance, noise, and increased human activity. This oversight significantly undermines any assertions made about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is notably flawed due to an over-reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This method is likely to underrepresent the presence of basking sharks in these waters, particularly when compared to more reliable land-based observations that indicate their frequent usage of the area. The failure to include or appropriately consider such data further compromises the completeness of the baseline and diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that assertions regarding negligible or non-significant effects are based more on assumptions than on substantial evidence. Additionally, the lack of adequate baseline data hampers any meaningful evaluation of cumulative and indirect impacts, including seasonal fluctuations and broader ecosystem interactions. This uncertainty clouds the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set out by the Environmental Impact Assessment regime or the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty introduced by these deficiencies means that adverse effects cannot be ruled out beyond reasonable scientific doubt, invoking the precautionary principle. In light of these factors, granting consent is not legally justifiable.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment untrustworthy. These issues impede a thorough evaluation of impacts on marine ecology and protected species, ultimately highlighting the lack of a robust evidential foundation for the application.

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 materially flawed, containing significant

gaps in evidence and internal inconsistencies that undermine its conclusions. The application does not convincingly demonstrate that these species will not be adversely affected, failing to robustly evaluate the implications of displacement, collision risk, or habitat loss, particularly in relation to key foraging areas and migratory pathways.

There is a fundamental contradiction present within the application itself. While the developer concludes that there will be no significant adverse effects, they simultaneously advance a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions drawn are not adequately supported by the underlying evidence.

Moreover, the assessment does not provide sufficient evidence that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling approaches introduces uncertainty, especially for species that are in severe decline, including Kittiwakes and Fulmars. The methodologies employed appear likely to underestimate mortality rates, particularly where baseline data is lacking and behavioural responses are not comprehensively understood.

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

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

The identified deficiencies also represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is unreliable due to its internal inconsistency, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of the impacts, leading to the conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely flawed, overlooking the West Lewis coastline as a dynamic cultural landscape where

environment, language, tradition, and community are deeply interwoven. The application adopts a narrow perspective, treating heritage as a collection of separate, unchanging assets rather than recognising their ongoing social, cultural, and spiritual relevance to the community.

A significant shortcoming is evident in the handling of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active burial grounds and places of spiritual significance, yet the assessment erroneously classifies them as static entities, neglecting their current use, meaning, and the development's effects on their surroundings. This incorrect portrayal leads to an incomplete understanding of cultural impacts and disregards their vital role in community life.

Moreover, the application fails to consider intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship the community has with the coastal environment. These aspects are essential to the area's identity but are entirely omitted from the assessment, marking a significant gap. Without recognising these factors, the true cultural impact of the development remains inadequately understood.

There are also serious concerns regarding community rights and involvement. The Gaelic-speaking community possesses a unique cultural identity akin to that of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and does not adhere to established principles of participation in matters affecting cultural and environmental interests.

A critical procedural oversight is the failure to produce a compliant Island Communities Impact Assessment, a statutory obligation under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal duty to examine the social, cultural, and economic implications for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings position the proposal in direct opposition to the National Planning Framework 4, particularly regarding the protection of historical assets and places. The neglect to consider both tangible and intangible heritage, alongside the failure to acknowledge living cultural practices, represents a clear deviation from policy requirements.

In summary, the oversight in assessing living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal's social impacts on the community have not been adequately assessed. The developer produced a Social Impact Assessment, which included discussions with

local residents, but the complete report has not been shared. This lack of transparency creates a significant gap in the evidence, preventing both the public and the responsible authorities from understanding the social risks revealed by the developer's research.

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, seascape, and landscape is significantly flawed and does not reflect the true scale of change or the sensitivity of the environment. The coastline of West Lewis features an open Atlantic horizon and an undeveloped

character, contributing to a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately convey the magnitude of this visual change. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the naturalness and remoteness that define the area. The assessment does not accurately reflect this level of impact or its significance within such a sensitive landscape.

There are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may be understated, thus compromising the reliability of the assessment.

Another critical deficiency is the lack of evaluation regarding the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape interconnected by visual and spatial relationships with the Atlantic horizon. The assessment treats these as isolated features, failing to acknowledge their interdependence, which leads to an incomplete evaluation of impacts on their setting and cultural significance.

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on undefined future measures raises particular concern given the sensitivity of the receiving environment. The coastline of West Lewis supports clean coastal waters and important habitats that are vulnerable to disturbance and contamination from sediment. Although the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it fails to provide sufficient details on how these risks will be prevented, controlled, or monitored.

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

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

From a regulatory viewpoint, the deferral of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation must be assessed prior to consent, and without this information, a lawful determination cannot be reached. The application also fails to demonstrate compliance with policy requirements regarding environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty concerning potential impacts collectively render the assessment materially deficient. These shortcomings obstruct a robust evaluation of construction and pollution risks and support 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 lacks a thorough assessment of the ecological and socio-economic impacts. There is a concerning assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can bear additional pressure. This critical oversight raises the risk of overfishing in other areas and poses potential economic repercussions for the local fleet. Without a detailed, evidence-based evaluation, it is impossible to grasp the true impacts on fisheries and the livelihoods that depend on them.

Moreover, the proposal poses significant risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is likely to disturb marine life over large distances, affecting species such as dolphins. The anticipated disturbance to a notable portion of the local bottlenose dolphin population is deeply concerning, yet the application underestimates the significance of these effects and lacks adequate supporting evidence.

The application exhibits a troubling inconsistency in acknowledging the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction seriously undermines the assessment's credibility and raises questions about compliance with the Habitats Regulations, particularly when harm is anticipated that requires legal authorisation. Furthermore, the assessment does not address the cumulative impacts resulting from habitat disturbance, noise, and the displacement of fishing activities. Without a thorough analysis of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains indeterminate.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal signifies sustainable development. Collectively, the inadequacies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is notably inadequate, failing to capture the full range of impacts resulting from a single, integrated project. The offshore turbines and the associated onshore works are fundamentally interconnected; however, they have been evaluated separately, leading to a disjointed approach that obscures the true extent of environmental and socio-economic repercussions.

Onshore components entail cabling across designated protected moorland, the establishment of a substation near Stornoway, and the requisite access infrastructure traversing sensitive landscapes. These construction activities involve excavation in

areas of deep peat, particularly within Barvas Moor, a crucial carbon store and an ecologically sensitive area. The application lacks a thorough assessment of these impacts, thereby hindering a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates the consideration of all project components in conjunction, yet the division between offshore and onshore elements results in a lack of clarity regarding the combined impacts on peatlands, habitats, and local communities.

There are substantial risks posed to vulnerable habitats, including machair systems and peatland environments, which are under policy protection. The application fails to prove that impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented, indicating a significant gap in the evidence relating to biodiversity protection.

Moreover, concerns arise regarding the carbon balance associated with the proposal. The disturbance of peatland has the potential to release stored carbon, which could lead to a carbon debt and contradict the goals of renewable energy development. The application does not sufficiently address this concern or demonstrate that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land presents possible conflicts with existing land uses and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, thereby raising doubts about its feasibility and lawful execution.

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

In summary, the disconnection of project components, the absence of a comprehensive assessment, and the insufficient evidence on environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed when assessed against statutory duties, national policy, and evidential standards related to sustainable development. It echoes the key issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, which found the level of industrialisation unacceptable. This current application is made under a policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community

wellbeing even more strongly.

The evidential basis for this application is incomplete and unreliable. Critical gaps exist in the baseline data, there is reliance on an undefined design envelope, and mitigation measures are unspecified. Additionally, key impacts such as those on nocturnal wildlife, full onshore infrastructure, and tourism effects have been omitted. As a result, the Environmental Impact Assessment falls short and does not provide a clear picture of likely significant effects or any residual impacts.

There are procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches the statutory duty outlined in the Islands (Scotland) Act 2018. Furthermore, not fully disclosing the Social Impact Assessment is a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is at odds with National Planning Framework 4. It does not show evidence of protecting biodiversity, natural places, or cultural heritage. There is also no assurance that health and wellbeing impacts are acceptable, nor is there evidence of a net economic benefit since tourism impact modelling is absent. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, leaving effects on peatlands, carbon balance, habitats, and crofting land obscure.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals lack completeness and contain inconsistencies. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion on the acceptability of impacts.

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

In conclusion, the application is unfit for determination both procedurally and substantively. The volume of information deficiencies, alongside policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. The competent authority should refuse consent for this application or utilise the appropriate regulatory measures to mandate the submission of the necessary missing information.

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

Additional Comments

I am extremely concerned of the wider impact on our environment in Scotland not only to wildlife but the extreme pollution impact for our children and grandchildren. I also understand that these monstrous structures are causing major environment impact on the earth/ environment by the sheer scale of their production and products used. It beggars belief that those supposed 'net zero' (a total fallacy of course) approaches for energy actually require more energy to produce and cannot be recycled.

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: 4BD09A8E

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted in accordance with marine licensing and Environmental Impact Assessment requirements. The basis of this objection arises from a thorough review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is situated off the west side of the Isle of Lewis, a region celebrated for its Atlantic-facing coastline, nearly unspoiled environment, and rich cultural heritage. The size, location, and design of the wind farm present serious issues regarding their compliance with statutory obligations, national policies, and the overarching principles of sustainable development.

The application is fundamentally flawed due to its failure to present sufficient evidence for a lawful decision. Notably, essential environmental data is absent, baseline information provided is limited and inconsistent, and crucial elements of the proposal lack clear definition. The flexible design framework used raises doubts about the understanding of significant impacts, while the reliance on unspecified mitigation strategies hampers any assessment of their potential effectiveness. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community effects, and assertions of negligible or insignificant impacts lack credible substantiation.

Additionally, the application reveals substantial conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and public health. There is no evidence to demonstrate that national obligations regarding the protection of biodiversity, climate considerations, and environmental integrity can be fulfilled. These inconsistencies directly affect the statutory tests necessary for consent, thereby compromising the capability of the competent authority to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposed development raises further concerns, with large turbines positioned unnervingly close to the shore, leading to significant worries about landscape capacity, visual impact, and environmental consequences. In light of the lack of adequate information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and does not support a lawful decision. Under these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is incomplete and fails to deliver a full, transparent, or dependable account of the potential environmental effects of the proposal. The flexible Project Design Envelope used lacks commitment to specific turbine dimensions, layouts, or configurations, introducing significant uncertainty. This flexibility obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. As a result, the impacts presented may not accurately represent the development that will ultimately be constructed, leaving both the public and the competent authority unaware of the true extent of environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that have not yet been defined. This approach prevents any meaningful evaluation of effectiveness or assessment of residual impacts, as it relies on the notion that environmental harm will be addressed at a later stage. Such deferral of critical information to post-consent phases is procedurally unacceptable and contradicts the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be established clearly before determination.

The report also shows significant evidential deficiencies, with gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This lack of robust supporting data leads to uncertainty regarding the scale and significance of impacts, especially where conclusions regarding negligible or non-significant effects are drawn. The insufficient information hinders a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it is unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data all contribute to rendering the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to provide a reliable understanding of ecological receptors within the West Lewis coastal environment due to a materially deficient assessment of marine ecology and protected species. This area is recognised as a highly sensitive and

biologically active marine system, yet the baseline data presented is incomplete. The methodologies employed do not adequately capture crucial information about species presence, behaviour, and habitat use, resulting in an insufficient evidential basis for evaluating potential impacts.

A significant omission in the assessment relates to otters, classified as a European Protected Species. The application does not appropriately recognise or assess the active use of coastal areas by otters for foraging and movement. The oversight of their core foraging range and behavioural patterns means that potential effects arising from construction disturbance, noise, and increased activity have not been sufficiently evaluated. This deficiency undermines any conclusions regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks is flawed due to the reliance on aerial surveys, which introduces significant detection bias, particularly under Atlantic conditions. Such an approach is likely to lead to an underestimation of their presence, especially in contrast to established land-based observations that indicate a frequent utilisation of these waters. The failure to incorporate or appropriately consider this data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

As a result of these methodological shortcomings, any conclusions asserting negligible or non-significant effects are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders meaningful assessments of cumulative and indirect impacts, including seasonal variation and broader ecosystem interactions. This creates uncertainty regarding the true scale of risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of 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 uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these conditions, consent cannot be lawfully granted.

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

question. The assessment fails to robustly evaluate critical aspects such as displacement, collision risk, and habitat loss, despite the fact that these seabird species are known to rely on key foraging areas and migratory pathways.

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application presents a fundamental inadequacy in its assessment of cultural heritage and community identity, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. It adopts a reductive approach, treating heritage merely as a collection of isolated and static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment reduces them to static features, neglecting their continued use, meaning, and the implications of development on their

surroundings. This mischaracterisation leads to an incomplete evaluation of cultural effects and overlooks their importance in community life.

Moreover, the assessment fails to address intangible cultural heritage, such as the Gaelic language, traditions, and the enduring connection between the community and its coastal environment. These elements are vital to the identity of the area but are glaringly absent from the assessment, representing a significant omission. Without the inclusion of these factors, the cultural impact of the development cannot be fully comprehended.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, characterised as possessing a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. The lack of meaningful engagement undermines the credibility of the assessment and disregards established principles of participation in decisions that affect cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018, constitutes a critical procedural failure. The absence of this assessment hinders the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic impacts on the island community. This omission alone precludes a lawful determination.

From a policy standpoint, these deficiencies conflict directly with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition of living cultural practices, clearly deviates from policy requirements.

In summary, the neglect to adequately assess living heritage, intangible cultural values, community rights, and statutory obligations results in a significant evidential gap. Consequently, the cultural impacts of the development have not been sufficiently evaluated, and the application does not provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding the assessment of social impacts, health, and wellbeing, which is materially deficient and lacks the necessary transparency for a lawful evaluation. Although the developer commissioned a Social Impact Assessment, including focus groups with local residents, the full report remains unpublished. This significant evidential gap 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.

Residents are reportedly experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement

and are, therefore, not speculative in nature. However, the failure to disclose the complete assessment hampers proper scrutiny of the findings and restricts the ability to assess their significance in the decision-making process.

There is evidence indicating that the proposal is seen as a direct threat to community identity and cohesion, with “cultural loss” highlighted in the developer’s findings. Despite this, such impacts have not been adequately incorporated into the main application or afforded appropriate consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

This lack of transparency detracts from the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functionality might be compromised. By failing to provide the complete dataset, the application does not offer a comprehensive evidential basis for weighing the benefits against the harms.

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

The procedural implications of these omissions are significant. The competent authority is unable to perform a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a material deficiency within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, results in an incomplete and unreliable assessment. This incapacity to provide sufficient information obstructs a lawful determination of the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts on the seascape, landscape, and environment is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the receiving environment. The West Lewis coastline, characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness, would undergo a fundamental transformation with the introduction of large-scale turbines in close proximity to the shoreline. Such developments would create a continuous industrial presence that would permanently alter the area's character.

Moreover, the application fails to accurately depict the scale of visual change. The turbines, due to their size and proximity, would dominate views from residential areas,

historic sites, and popular coastal locations. This would negatively affect visual amenity and diminish the key qualities of naturalness and remoteness, while the assessment does not effectively communicate the significance of these impacts within a sensitive landscape context.

There are also serious methodological issues regarding the choice and presentation of visual viewpoints. It appears that the selected viewpoints do not fully encompass the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the assessment has understated the magnitude of visual impact, thus questioning the reliability of its findings.

Furthermore, the assessment does not adequately consider the interconnected relationship between the landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, form part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities, neglecting their interdependence and leading to an incomplete understanding of the impacts on their cultural significance and setting.

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

From a policy standpoint, the proposal directly contradicts National Planning Framework 4, which aims to protect natural spaces and historic assets. The extent of the proposed changes is incompatible with the need to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately reflect the scale of impact, the environment's sensitivity, or the interrelatedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this vital landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation activities within a dynamic Atlantic environment. However, the assessment of construction and pollution

risks is lacking in completeness and fails to provide the necessary detail for evaluating the likely environmental effects. Notably, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans. The application instead leans on mitigation and contingency measures that are to be developed after consent, which obstructs any meaningful evaluation of their adequacy or effectiveness.

The absence of clearly defined emergency response procedures exacerbates these issues. By postponing contingency planning until after consent is granted, the application inhibits the assessment of whether sufficient safeguards exist to address potential pollution events. This procedural risk undermines the capacity of the competent authority to evaluate environmental protection measures at the time of determination.

Moreover, there are considerable uncertainties concerning the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. Robust modelling and clearly defined management strategies are necessary to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also extends to potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment context.

The application acknowledges the risks of sediment mobilisation and accidental chemical or oil spills but lacks sufficient detail on the preventative, control, or monitoring measures. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination, highlighting the sensitivity of the receiving environment.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigations must be assessed before consent is granted, and without such information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the combined lack of defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts lead to a materially deficient assessment. These issues hinder a thorough evaluation of construction and pollution risks and reinforce the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

One major concern is the assumption that fishing activities can be relocated without

negative effects. The application fails to provide evidence that alternative fishing grounds exist, are accessible, or can sustain the added pressure. This gap in the assessment is crucial, as displacing fishing efforts could lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fishing fleet. The lack of a clear, evidence-based assessment hampers the understanding of impacts on fisheries and local livelihoods.

Moreover, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over extended periods is likely to disturb marine life over large areas, particularly species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises pressing concerns, yet the application minimizes these effects without providing adequate supporting evidence.

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

Furthermore, the assessment neglects to account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a comprehensive review of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal includes onshore infrastructure that is assessed separately from offshore turbines. This fragmented approach fails to capture the full extent of impacts from what is a single integrated project. The onshore elements consist of cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which is an important carbon store and ecologically sensitive habitat. The application does not provide a thorough assessment of these impacts, limiting the understanding of the project's overall environmental footprint.

By deferring the assessment of onshore impacts, the application undermines the evaluation of cumulative effects. The Environmental Impact Assessment process requires all project components to be considered together. However, by treating the offshore and onshore elements separately, the combined effects on peatlands, habitats, and local communities are not fully comprehended.

There are significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that impacts on these habitats have been assessed or that avoidance measures have been implemented. This results in a clear evidential gap concerning biodiversity protection.

Concerns also arise regarding carbon balance. Disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts the aims of renewable energy development. The application does not sufficiently address this issue or show that the overall carbon balance remains advantageous.

Moreover, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises questions about its feasibility and legality.

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

Overall, the separation of project components, the absence of comprehensive assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and unreliable, which obstructs a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in the area's environmental quality, cultural identity, and tourism value. The proposed development would introduce permanent red aviation lighting that is visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This alteration would fundamentally change the night-time environment.

There is no assessment of the impact this lighting would have on visual amenity, landscape character, or the experiences of residents and visitors. Such an omission is particularly significant given the importance of dark skies to the identity of the area and to emerging sectors like astro-tourism. The failure to consider these impacts reveals a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of evaluation regarding the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The application lacks a lighting impact assessment or phototaxis study and thus fails to evaluate how the proposed aviation lighting may affect these species or raise mortality rates.

Furthermore, the reliance on daytime survey data in the ornithological assessment neglects nocturnal activity and associated risks. For instance, species like Kittiwakes, which may forage or migrate at night, are also susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard necessary to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and preventing 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 undermines the wider assessment of landscape and seascape impacts, as night-time character is an integral aspect of the environment.

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

TOURISM

The economic impact of tourism on the Isle of Lewis is critically significant, having grown from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. However, the assessment conducted by the application is profoundly deficient, failing to adequately evaluate how large-scale offshore infrastructure may affect visitor numbers, behaviour, or overall economic contributions. It is acknowledged that 86% of visitors are attracted by the area's stunning scenery, yet there is no quantified analysis to demonstrate how the industrialisation of the seascape and a decline in environmental quality could influence tourism's Gross Value Added or the broader economic resilience of the island.

The importance of unspoiled landscapes and dark skies to the visitor experience and emerging tourism markets, such as nature-based and astro-tourism, is overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a significant gap in understanding the potential impacts on a vital and expanding segment of the local

economy. Furthermore, in a community with limited economic diversification, neglecting to assess the effects on tourism raises serious concerns regarding employment, local businesses, and community sustainability.

The application does not include a compliant Island Communities Impact Assessment, resulting in an unaddressed evaluation of these economic vulnerabilities, as stipulated under the Islands (Scotland) Act 2018. Policy-wise, the failure to demonstrate compliance with the National Planning Framework 4 is evident, particularly concerning economic impact and the necessity to illustrate a net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and fails to provide adequate evidence for competent authorities to assess the economic ramifications of the proposal.

In sum, the lack of a comprehensive evaluation of tourism impacts, the failure to consider environmental factors influencing visitor behaviour, and the disregard for the island's economic dependency culminate in a significant evidential gap. This undermines any robust evaluation of the economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. It mirrors the issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a concern. This new application is presented within a stronger policy framework that places significant emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable evidential basis for determination is lacking, characterised by critical gaps in baseline data. The ongoing use of an undefined design envelope and reliance on unspecified mitigation measures further undermine its credibility. Additionally, important impact pathways, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism implications, have been omitted. As a result, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The lack of a compliant Island Communities Impact Assessment contravenes the statutory duty established under the Islands (Scotland) Act 2018, while the failure to disclose the complete Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

In direct contradiction to National Planning Framework 4, the proposal does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage.

It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring their impact on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks are present. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I strongly object to this proposal. I have followed the developments over the last few years and see no benefit whatsoever to either people, ecology or environment. It is all part of a get-rich-quick scheme under the guise of a fake "green agenda". It is anything but "green" - it is harmful and damaging to all, including in the long term the handful of greedy and corrupt individuals who believe they are profiting from this initiative.

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: 630BBECE

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several significant deficiencies, rendering it materially inadequate in providing a full and transparent account of the likely environmental effects associated with the proposal. The approach of employing a flexible Project Design Envelope, which does not commit to specific

dimensions, layouts, or configurations of the turbines, introduces substantial uncertainty. This lack of specificity compromises the ability to apply a worst-case scenario consistently, thereby undermining the integrity of the assessment. Consequently, the impacts reported may not accurately represent the development as it will ultimately be constructed, preventing both the public and the competent authority from grasping the true extent of the environmental effects involved.

Additionally, the application's heavy reliance on mitigation measures, monitoring strategies, and management plans that remain undefined leads to an untenable situation where consent is sought on the premise that environmental harm will be addressed in the future. This deferral of critical information to stages occurring after consent is granted is procedurally unacceptable and runs counter to the objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation measures are clearly delineated before any determination is made.

There are notable evidential shortcomings within the report, including substantial gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These factors culminate in uncertainty regarding the scale and significance of the impacts, particularly in instances where conclusions of negligible or non-significant effects are presented without robust supporting data. The deficiency 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.

As a result, the application does not fulfil the evidential threshold mandated under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation engages the precautionary principle, particularly with respect to protected species and sensitive habitats. Furthermore, the proposal does not demonstrate compliance with National Planning Framework 4, particularly regarding biodiversity protection and environmental integrity, as it has not been established that impacts have been thoroughly assessed or that appropriate safeguards are in place.

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

ASSESSMENT OF ALTERNATIVES

The proposal fails to meet the statutory requirements of the Environmental Impact Assessment regime, as the assessment of alternatives is materially inadequate. Instead of offering a structured comparison of realistic alternatives based on their environmental effects, the application merely presents a narrative account of how the project has evolved. This methodology does not sufficiently demonstrate that less

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

There is a clear lack of a transparent, evidence-based comparison of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the developer has seriously considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The West Lewis coastline is sensitive, and proximity to the shore is critical in assessing impact; without this analysis, one cannot conclude that the proposed siting is the least damaging available option.

These shortcomings also extend to the assessment of cable routing and landfall, where there is inadequate evidence that alternative routes have been thoroughly explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear strategy to avoid these impacts and the absence of comparative analysis suggest that mitigation by design has not been considered, relying instead on post-design measures for mitigation.

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

From a policy standpoint, this deficiency jeopardises 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 significant and contributes to the overall conclusion that the application has not undergone adequate assessment, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed application presents significant shortcomings in its assessment of marine ecology and protected species in the West Lewis coastal environment. This area is known for its sensitivity and biological activity, yet the baseline data is insufficient. The methodologies used do not adequately account for the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a reliable basis for understanding the potential impacts.

A notable gap in the evaluation concerns otters, which are classified as a European Protected Species. The application does not adequately recognise their active use of coastal zones for foraging and movement. The assessment neglects to consider their core foraging range and behavioural patterns, which leads to an insufficient evaluation of potential impacts from construction disturbance, noise, and increased human activity. This undermines claims about the absence of significant effects on otters.

Additionally, the assessment of basking sharks contains flaws. The reliance on aerial surveys introduces a risk of detection bias, especially under Atlantic conditions, which could result in an underestimation of their presence. This is particularly concerning when compared to established land-based observations that show frequent use of these waters. Ignoring or inadequately addressing this information further undermines the baseline data and weakens the conclusions drawn.

The methodological weaknesses mean that conclusions regarding negligible or non-significant effects rely on assumptions rather than solid evidence. The lack of adequate baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the actual risks to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification or assessment of protected species. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Therefore, consent cannot be lawfully granted under these conditions.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies in the ornithological assessment, which is riddled with internal inconsistencies and lacks adequate evidence. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already declining, yet the application does not convincingly show that these species will remain unharmed. The development site is situated within key foraging areas and migratory pathways, but the assessment fails to thoroughly analyse the potential impacts of displacement, collision risk, or habitat loss.

A notable contradiction arises within the application, as the developer claims there will be no significant adverse effects while also proposing a Habitats Regulations derogation case. Such a case is only necessary if significant harm is anticipated, raising doubts about the reliability of the assessment and suggesting that the conclusions drawn are not backed by adequate evidence. Furthermore, the assessment does not sufficiently demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will be unaffected. The critical nature of these feeding grounds is not fully recognised, and reliance on modelling techniques introduces uncertainty, particularly concerning species in critical decline like Kittiwakes and Fulmars. The methods employed are likely to underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

The placement of turbines in a recognised migratory corridor poses further risks, acting as a barrier within an essential flight path used by species migrating between the United Kingdom and Iceland. The application does not adequately consider the long-term consequences of continued mortality in this corridor or the possible effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to demonstrate no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, along with data gaps and limitations in modelling, indicates that the required standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and hampers a lawful conclusion in favour of consent.

Additionally, the identified shortcomings reflect a failure to adhere to the National Planning Framework 4, particularly regarding biodiversity protection and the conservation of natural assets. The inability to prove that internationally significant seabird populations will not be adversely affected places the proposal at odds with national policy.

In summary, the assessment is deemed 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 does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vital cultural landscape where community, environment, language, and tradition are deeply intertwined. The assessment of cultural heritage and community identity falls short, treating heritage as isolated and static assets, rather than recognising their ongoing cultural, social, and spiritual significance to the community.

Particularly concerning is the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet they are mischaracterised as static features in the assessment. This oversight neglects their continued importance and the impact of development on their surroundings, leading to an incomplete evaluation of the cultural effects and their significance to community life.

Furthermore, the assessment overlooks intangible cultural heritage elements, such as the Gaelic language and local traditions, as well as the community's longstanding relationship with the coastal environment. These factors are essential to the area's identity but are entirely missing from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

There are additional concerns regarding community rights and engagement. The Gaelic-

speaking community possesses a unique cultural identity and characteristics akin to those of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the assessment's legitimacy and disregards established participation principles regarding decisions that affect cultural and environmental interests.

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

From a policy standpoint, these shortcomings place the proposal in conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to assess both tangible and intangible heritage, along with the lack of recognition of living cultural practices, signifies a departure from policy requirements.

Collectively, the neglect of living heritage, intangible cultural value, community rights, and adherence to statutory obligations results in a significant evidential gap. The cultural impacts of the development remain inadequately assessed, and the application does not furnish a solid basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the assessment of social impacts, health, and wellbeing is a critical concern that undermines the entire evaluation process for this application. While the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report remains unpublished. This significant evidential gap hinders both public understanding and the competent authority's ability to gauge the full scope of social risks identified through the developer's own research.

Summaries available indicate that residents are currently facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These documented impacts stem from direct engagement with the community and are therefore grounded in reality rather than speculation. The failure to release the complete assessment restricts proper scrutiny of these findings and obstructs the determination of their significance in the decision-making process.

There is also a perception among the community that the proposal poses a direct threat to their identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this, the potential impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the full Social Impact Assessment conceals the genuine human and social costs associated with the development.

The implications of this lack of transparency extend to the Environmental Impact Assessment process as well. A comprehensive understanding of the social, economic, and health impacts is vital for developments of this magnitude, especially where community character and functioning are concerned. By failing to provide the complete dataset, the application lacks a thorough evidential foundation for weighing benefits against potential harm.

From a policy standpoint, the application does not satisfy the requirements outlined in National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and mitigate harm; however, the existing evidence suggests that adverse effects have not been fully disclosed. Without the full assessment, the application cannot demonstrate compliance with this policy.

The procedural ramifications are significant as well. The competent authority is unable to conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission in the application and a failure to satisfy the evidential standards demanded by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts associated with the proposal is fundamentally lacking and does not adequately capture the degree of change or the sensitivity of the environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped nature, conveys a strong sense of remoteness. The proposed large-scale turbines positioned near the shoreline would introduce a significant industrial presence, fundamentally altering this character and causing a permanent transformation of the landscape.

Moreover, the application fails to accurately represent the scale of visual change. Given their size and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would not only affect visual amenity but also diminish the essential qualities of naturalness and remoteness. The assessment inadequately communicates the significance of this impact, failing to consider the sensitivity of the landscape adequately.

Concerns arise from the methods used to select and present visual viewpoints. Evidence indicates that the chosen viewpoints may overlook the most sensitive receptors and fail to depict worst-case scenarios, particularly concerning key cultural heritage sites and valued landscapes. This risks underestimating the visual impact, which compromises the credibility of the assessment.

Another significant oversight is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context, linked visually and spatially to the Atlantic horizon. By treating these assets as isolated, the assessment neglects their interdependence, leading to an incomplete analysis of the impacts on their settings and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are perceived and disconnecting them from the natural horizon. This represents not just a visual impact but also a cultural and spatial harm that the application fails to assess properly.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the preservation of natural landscapes and historical assets. The proposed scale of change does not align with the requirements to protect landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case scenario assessment undermines claims of policy compliance.

Furthermore, it is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the anticipated change is not something that can be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is severely lacking, failing to provide the necessary detail for evaluating environmental effects. This proposal entails considerable seabed preparation and installation activities in a challenging Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be defined after consent, which obstructs any meaningful appraisal of their adequacy or effectiveness.

The reliance on vague future measures raises significant concerns, particularly given the sensitivity of the West Lewis coastline. This area is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges potential risks such as sediment mobilisation and accidental chemical or oil spills, it falls short in detailing how these threats will be prevented, controlled, or monitored.

There exists a notable uncertainty regarding the scale and dynamics of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly articulated management strategies, the impacts' extent, duration, and ecological consequences cannot be established. This uncertainty also extends to the effects on marine species and habitats that have already 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, the application hampers the evaluation of whether adequate safeguards are established to address potential pollution events. This creates procedural risk and diminishes the competent authority's ability to review environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and necessary mitigation must be evaluated prior to consent, and in the absence of such 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 defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts lead to a materially deficient assessment. These failures obstruct a thorough evaluation of construction and pollution risks and substantiate the assertion that the application remains incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are vital, not only for their diverse marine ecosystem but also for the active fishing industry that thrives there. However, the application in question fails to adequately assess the ecological and socio-economic impacts, raising profound concerns about the preservation of these critical resources. It is evident that the current evaluation does not sufficiently protect or maintain the existing habitats and uses of these waters, which is alarming.

A significant flaw within this proposal is the assumption that fishing activities can be relocated without any repercussions. The absence of evidence regarding the availability or suitability of alternative fishing grounds is particularly troubling. This oversight could lead to overfishing in other areas, potentially jeopardising the livelihoods of the local fishing fleet. Without a thorough and evidence-based examination, understanding the true impacts on fisheries and the communities that depend on them is impossible.

Moreover, the proposal presents considerable risks to marine species, especially due to the underwater noise generated during construction. The extended use of high-energy hammer piling is predicted to disturb marine life across considerable distances, including species like dolphins. The potential disruption to a notable portion of the local

bottlenose dolphin population is a serious concern, yet the application significantly downplays these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application, as it acknowledges the requirement for licences to allow harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction calls into question the reliability of the assessment and raises issues related to compliance with the Habitats Regulations, particularly when anticipated harm may require legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts of multiple factors, such as habitat disturbance, noise, and the displacement of fishing activities. Without an encompassing evaluation of these combined effects, one cannot ascertain the overall impact on marine ecosystems and the socio-economic conditions tied to them.

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 how the proposed development can coexist with current marine users or avoid detrimental impacts on marine biodiversity, making it impossible to conclude that this proposal aligns with sustainable development principles.

In conclusion, the lack of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies all contribute to an assessment that is incomplete and unreliable. Such deficiencies hinder any meaningful evaluation of the impacts on marine life and fisheries, leaving communities at risk.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The incomplete assessment of onshore infrastructure undermines the understanding of the full extent of impacts associated with this integrated project. Although the offshore turbines and onshore works are intrinsically linked, they have been evaluated separately, which obscures the true scale of the environmental and socio-economic consequences. The lack of a comprehensive assessment means that the cumulative effects on sensitive habitats, peatlands, and local communities remain unclear.

Onshore elements encompass cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a significant carbon store and is an ecologically sensitive habitat. The application has not adequately addressed the impacts of these works, preventing a full understanding of the project's overall environmental footprint.

Moreover, there are serious risks to critical habitats, including machair systems and peatland environments that are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that appropriate measures to avoid harm have been implemented. This results in a

significant evidential gap concerning biodiversity protection.

The proposal also raises vital concerns about carbon balance. Disturbance of peatland releases stored carbon, potentially leading to a carbon debt that contradicts renewable energy objectives. The application does not sufficiently tackle this issue or illustrate that the overall carbon balance remains beneficial.

Furthermore, routing infrastructure through active croft land poses conflicts with existing land use and legal rights. There is no evidence presented that the necessary consents or processes have been initiated, which raises questions about deliverability and lawful implementation.

From a policy standpoint, the failure to consider the project as a whole, alongside the lack of demonstrated protection for peatlands, habitats, and land use interests, conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be mitigated or avoided significantly weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife is a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a persistent and disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the area's identity and the growth of sectors like astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall assessment of the landscape and environmental factors.

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

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

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

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

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

TOURISM

The evaluation of tourism impacts within the application is seriously lacking, particularly regarding the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism is intrinsically linked to the region's natural assets, including its wild coastline, near-pristine landscapes, dark skies, and a prevailing sense of remoteness. The application indicates that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviours, or their overall economic contributions.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, which has resulted in the support of more than 1,000 jobs and accounts for as much as 16% of the island's economy. However, the application does not address how the anticipated industrialisation of the seascape and a potential decline in environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this essential analysis, it is impossible to ascertain whether the development would yield a net economic benefit or instead jeopardise a vital and expanding sector.

Moreover, the assessment neglects to consider how environmental quality underpins tourism, especially the critical role of unspoiled landscapes and dark skies in shaping visitor experiences and catering to emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, creating a significant gap in the understanding of impacts on a recognised and growing

segment of the local economy.

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

From a policy standpoint, the application does not successfully demonstrate compliance with National Planning Framework 4, especially regarding economic impact and the requirement to illustrate a net benefit. Additionally, it contradicts strategic objectives that prioritise tourism as a growth sector and does not furnish adequate evidence for the competent authority to evaluate the economic implications of the proposal.

In summary, the combined failures to quantify tourism impacts, assess the environmental influences on visitor behaviour, and recognise the island's economic dependencies result in a significant evidential void. This undermines a robust assessment of economic effects and leads to the conclusion that the application is fundamentally incomplete.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the criteria for sustainable development as set out by statutory duties, national policy, and evidential standards. It mirrors the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite being presented under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not offer a comprehensive or reliable evidential basis for assessment.

There are significant deficiencies in the baseline data, the use of an undefined design envelope, and reliance on unspecified mitigation measures. Additionally, it omits crucial impact pathways concerning nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and fails to provide a full understanding of the likely significant effects or residual impacts.

Procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment is a breach of the Islands (Scotland) Act 2018, and the failure to disclose the complete Social Impact Assessment is a material omission. These failures hinder the competent authority from properly assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as it does not include tourism impact modelling. Furthermore, the cumulative effects of offshore and onshore components have not been sufficiently evaluated, obscuring impacts 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 sometimes inconsistent. The evidential threshold necessary to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and impeding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The breadth of information deficiencies, coupled with policy conflicts and unresolved environmental risks, prohibits a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or invoke the relevant regulatory provisions to require the submission of the missing information. Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be refused in its entirety.

[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: 694DD228

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 presents significant shortcomings and fails to deliver a complete, transparent, or dependable account of the likely environmental consequences of the proposal. The adoption of a flexible Project Design

Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates a substantial level of uncertainty. This lack of clarity undermines the assessment's integrity, making it impossible to consistently apply a worst-case scenario. Consequently, the impacts outlined may not accurately represent the final development, hindering both public understanding and that of the competent authority regarding the true scale of environmental effects.

Furthermore, the application depends on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be addressed later, it becomes impossible to conduct a meaningful evaluation of the effectiveness of these measures or to assess any residual impacts. This postponement of essential information to post-consent phases is procedurally inappropriate and contradicts the core purpose of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established prior to decision-making.

Additionally, there are marked evidential deficiencies, including inadequate baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These issues result in uncertainty regarding the magnitude and significance of impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust data to support them. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

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

Collectively, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies prevent a lawful and thorough assessment of environmental effects, meaning that the competent authority lacks the necessary information to make a sound determination regarding the application.

ASSESSMENT OF ALTERNATIVES

The application lacks a structured and transparent assessment of alternatives, failing to meet the statutory requirements set by the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of viable options based on environmental impacts, it merely recounts the project's evolution. This narrative does not adequately show that less harmful alternatives have been properly identified, evaluated, and preferred over more damaging choices.

There is no evidence-based or transparent comparison of different offshore locations, development scales, or design configurations. Specifically, the application does not indicate that the developer has thoughtfully considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, coupled with the critical importance of proximity to shore in assessing impacts, highlights that the lack of such analysis prevents any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the evaluation of cable routing and landfall assessment, where the evidence presented does not confirm that alternative routes have been sufficiently explored to minimise impacts on sensitive receptors. This includes significant areas such as Barvas Cemetery, which hold cultural and spiritual importance. The absence of a clear avoidance strategy and comparative analysis suggests that design-led mitigation has not been employed, relying instead on measures to mitigate impacts after the design phase.

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

From a policy viewpoint, these shortcomings undermine adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated, hindering lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is incomplete and does not give a reliable understanding of ecological receptors in the West Lewis coastal area. This region is a sensitive and biologically rich marine environment, yet the baseline data is lacking, and the methods used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to provide a solid evidential foundation for determining impacts.

A significant shortcoming involves otters, which are a European Protected Species. The application does not adequately recognise or assess their use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns means that potential effects from construction disturbances, noise, and increased activity have not been thoroughly evaluated. This weakens any assertions made regarding the lack of significant effects on this species.

Further issues arise in the assessment of basking sharks. The reliance on aerial surveys creates a notable detection bias, especially under Atlantic conditions, likely leading to an underestimation of their presence. In contrast, established land-based observations indicate that these waters are frequently used by basking sharks. The failure to properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological flaws mean that claims of negligible or non-significant effects are based more on assumptions than on strong evidence. The lack of sufficient baseline data also hampers the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions about the real risks 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 National Planning Framework 4, as protected species have not been adequately identified or assessed. This uncertainty means that adverse effects cannot be excluded beyond reasonable scientific doubt, activating the precautionary principle. Therefore, consent cannot be lawfully granted.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is fundamentally flawed, as it fails to acknowledge this area as a dynamic cultural landscape where environment, language, tradition, and community are interwoven. Instead, the application employs a narrow perspective, viewing heritage merely as a collection of static assets rather than recognising their ongoing social, cultural, and spiritual significance within the community.

A notable shortcoming in this assessment is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet they are mischaracterised as static features. This oversight neglects their continued use and the influence of development on their surroundings, leading to an inadequate evaluation of cultural effects and a disregard for their importance in community life.

Furthermore, there is a lack of assessment regarding intangible cultural heritage, such as the Gaelic language and traditions, as well as the enduring relationship between the community and the coastal environment. These aspects are integral to the area's identity but are completely omitted from the assessment, which is a significant gap. Without acknowledging these elements, the cultural implications of the development remain improperly understood.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, possessing a distinct cultural identity akin to that of Indigenous Peoples, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to comply with established principles of participation in matters that affect cultural and environmental interests.

A critical failure of procedure is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal responsibilities to evaluate the social, cultural, and economic impacts on the island community. This omission in itself precludes a lawful determination of the proposal.

From a policy standpoint, these shortcomings directly contravene National Planning Framework 4, particularly concerning the protection of historic assets and places. The neglect to consider both tangible and intangible heritage, as well as the failure to recognise living cultural practices, signifies a clear deviation from policy expectations.

In summary, the failure to adequately assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural impacts of the development have not been sufficiently evaluated, and the application does not provide an adequate foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding its social impacts, health, and wellbeing, which have not been adequately addressed. A Social Impact Assessment was commissioned by the developer, including engagement with local residents through focus groups. However, the full report has not been made available, leading to a significant evidential gap that hinders both the public's understanding and the competent authority's ability to fully grasp the social risks identified by the developer's research.

Residents are reportedly experiencing stress, anxiety, and concern related to the scale and proximity of the proposal, as indicated in available summaries. These effects stem from direct engagement with the community and are therefore based on real experiences rather than speculation. The failure to disclose the complete assessment restricts proper scrutiny of these findings and affects the evaluation of their importance in the decision-making process.

Additionally, the proposal has been viewed as a threat to community identity and cohesion, with a noted risk of "cultural loss" highlighted in the developer's findings. Despite this acknowledgment, such impacts have not been adequately incorporated into the main application, nor have they been afforded appropriate consideration. The lack of transparency surrounding the full Social Impact Assessment conceals the true human and social costs associated with the development.

This deficiency in disclosure compromises the Environmental Impact Assessment process. For developments of this magnitude, a thorough understanding of social, economic, and health implications is crucial, especially when community character and functionality may be impacted. The absence of the complete dataset means that the application lacks a comprehensive evidential foundation for evaluating the balance between potential benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 concerning health and wellbeing. Developments are expected to foster positive health outcomes and mitigate harm; however, the available evidence suggests existing negative effects that have not been fully revealed. Without the complete assessment, it is impossible to prove compliance with this policy.

The procedural ramifications of these omissions are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a significant omission within the application, failing to meet the evidential requirements established by the Environmental Impact Assessment framework.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with evidence of pre-existing adverse effects, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and reinforces the assertion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed application fails to properly assess the impacts on seascape, landscape, and visual aspects, leading to significant deficiencies in understanding the extent of change and the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. Large-scale turbines close to the shoreline would introduce a dominant industrial presence that would fundamentally change this character, resulting in a permanent and irreversible transformation of the landscape.

The visual changes that would arise from the installation of these turbines are not adequately represented in the application. Due to their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations. This would diminish visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not sufficiently capture the significance of this impact within such a sensitive landscape.

Concerns also exist regarding the methods used to select and present visual viewpoints. Evidence indicates that the viewpoints may not encompass the most sensitive receptors or worst-case scenarios, especially regarding key cultural heritage sites and high-value landscapes. As a result, the magnitude of the visual impact may be understated, which casts doubt on the reliability of the assessment.

Moreover, the application neglects 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 visually and spatially to the Atlantic horizon. Treating these assets in isolation disregards their interdependence, leading to an incomplete assessment of impacts on their setting and cultural importance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The extent of change proposed is not in alignment with the requirement to preserve landscape character, visual amenity, and the context of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, the resultant change is fundamental and permanent, with no possibility of reduction to an acceptable level through mitigation.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally incomplete, failing to recognise the interconnected nature of the offshore turbines and the onshore works. These components are assessed independently, leading to a fragmented evaluation that conceals the true extent of environmental and socio-economic consequences.

The onshore project includes the construction of a substation near Stornoway, cabling across protected moorland, and additional access infrastructure through sensitive landscapes. Notably, these activities involve excavation in areas of deep peat, particularly in Barvas Moor, a critical carbon store and ecologically sensitive habitat. The lack of a thorough assessment of these impacts means that the overall environmental footprint of the project remains unclear.

By neglecting the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment process

mandates that all project components be evaluated together; however, the distinction between offshore and onshore elements prevents a full understanding of the combined effects on peatlands, habitats, and local communities.

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

Concerns also arise regarding carbon balance, as the disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that contradicts the aims of renewable energy development. The application falls short in addressing this issue and fails to establish that the overall carbon balance remains favourable.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. There is insufficient evidence that necessary consents or processes have been initiated, which brings into question the deliverability and lawful implementation of the project.

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

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

TOURISM

The application presents a significant evidential gap regarding the assessment of tourism impacts, which is crucial for understanding the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism thrives on the region's wild coastline, near-pristine landscapes, dark skies, and the prevailing sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions.

The tourism sector has experienced remarkable growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application neglects to model the potential impacts of industrialising the seascape and the loss of environmental quality on Tourism Gross Value Added and broader economic resilience. In the absence of such

analysis, it remains unclear whether the proposed development would yield a net economic benefit or detract from a well-established and expanding sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in attracting tourists, particularly the value of unspoiled landscapes and dark skies to visitor experiences. This oversight extends to the failure to include a Dark Skies Assessment, creating a substantial void in understanding the implications for an acknowledged and developing aspect of the local economy, such as nature-based tourism and astro-tourism.

Given the limited economic diversification in this island community, the neglect in assessing tourism impacts carries broader implications for employment, local businesses, and the sustainability of the community. The lack of a compliant Island Communities Impact Assessment signifies that these economic vulnerabilities have not been evaluated as stipulated under 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 of showcasing 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.

In summary, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependency culminates in a substantial evidential shortfall. This deficiency obstructs 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 highlights significant procedural and evidential deficiencies that render it unfit for determination. It fails to meet the requirements of sustainable development as mandated by statutory duties and national policy. This application repeats the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite now being presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still does not provide a complete or reliable evidential basis for assessment.

Critical gaps exist in the baseline data, and the continued use of an undefined design envelope raises further concerns. Additionally, there is an overreliance on unspecified mitigation measures, as well as the omission of significant impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential effects on tourism. Consequently, the Environmental Impact Assessment remains incomplete, lacking the depth required to fully understand likely significant effects or residual impacts.

Procedural shortcomings are also evident. The absence of a compliant Island Communities Impact Assessment breaches the statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the comprehensive Social Impact Assessment constitutes a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues alone are substantial enough to deem the application unsuitable for consideration.

In terms of national policy alignment, the proposal is in direct conflict with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, or cultural heritage. The health and wellbeing impacts have not been sufficiently addressed, nor has there been any evidence of net economic benefits, particularly given the lack of tourism impact modelling. Moreover, the cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks remain significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, invoking the precautionary principle and hindering a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application suffers from extensive information deficiencies, policy conflicts, and unresolved environmental risks, rendering it procedurally and substantively unfit for determination. The competent authority must refuse consent based on these grounds or utilise the appropriate regulatory measures to demand the submission of the missing information. Therefore, a formal request is made for the complete refusal of the application for the Spiorad na Mara Offshore Wind Farm.

Additional Comments

All negative impacts for the local community, any positive impacts accrue to people elsewhere with no attempt to have benefits delivered locally to mitigate the negative impacts.

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: D8270873

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and the accompanying documentation, highlighting significant deficiencies in planning, environmental, cultural, and procedural aspects. The development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural identity. Concerns regarding the scale, proximity, and design of the project question its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present a sufficient evidential basis for a lawful decision. It is marked by missing critical environmental data, limited and inconsistent baseline information, and undefined key aspects of the proposal. The employment of a flexible design framework hinders a clear understanding of potential significant effects, and the dependence on unspecified mitigation measures prevents an assessment of their efficacy. Consequently, the documentation fails to provide a comprehensive or informed view of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

There exist pronounced and substantial conflicts with policy. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate compliance with national mandates to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly challenge the statutory tests required for consent and compromise the competent authority's ability to determine the development's acceptability in policy terms.

Moreover, the proposal's scale is unprecedented for this area, with large turbines located in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of adequate information, dependence on undefined mitigation, evidential shortcomings, and evident policy violations, it is clear that the application is incomplete and cannot substantiate a lawful determination. In light of these issues, the precautionary principle must be invoked.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical contradiction emerges within the application itself. The developer claims there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is typically warranted when significant harm is anticipated. This inconsistency raises serious questions about the validity of the assessment and suggests that the conclusions drawn are not substantiated by the available evidence. Furthermore, the assessment lacks adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is not properly recognised, and reliance on modelling introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. Methodologies used are likely to underestimate mortality rates, especially given the incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory standpoint, the application falls short of the evidential standards required to confirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, alongside data gaps and modelling limitations, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle, thereby hindering a lawful conclusion in favour of consent. Moreover, the identified deficiencies reflect a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally significant seabird populations will not be adversely affected directly contradicts national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment presented in the application significantly underrepresents the cultural heritage and community identity associated with the West Lewis coastline. This area

should be recognised as a living cultural landscape, where the environment, language, tradition, and community are fundamentally interconnected. Instead, the application adopts a reductive viewpoint, treating heritage merely as a collection of isolated and static assets, neglecting to acknowledge their ongoing social, cultural, and spiritual significance to the community.

A notable shortcoming is 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; however, they are mischaracterised in the assessment as static features. This oversight disregards their continued use and meaning, as well as the implications of development on their setting. Such a misrepresentation leads to an inadequate evaluation of cultural impacts, ignoring the essential role these sites play in community life.

Moreover, the assessment overlooks intangible cultural heritage elements, including the Gaelic language and traditions, along with the long-standing relationship the community has with the coastal environment. These factors are integral to the area's identity, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural impact of the proposed development.

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

Furthermore, a critical procedural error is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment inhibits the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission is significant enough to prevent a lawful determination regarding the application.

From a policy standpoint, these inadequacies place the proposal at odds with the National Planning Framework 4, particularly concerning the protection of historic assets and sites. The oversight in considering both tangible and intangible heritage, alongside the disregard for living cultural practices, represents a clear deviation from the stipulated policy requirements.

Overall, the lack of assessment of living heritage, intangible cultural values, community rights, and adherence to statutory obligations creates a substantial evidential gap. The cultural impacts of the development have not been thoroughly examined, and the application does not provide an adequate foundation for assessing the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts related to the proposed turbines is fundamentally inadequate, failing to capture the scale of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its unspoiled Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The proposed large-scale turbines, positioned near the shoreline, would establish a persistent industrial presence that would irrevocably alter this character and lead to a permanent transformation of the landscape.

Furthermore, the application does not accurately depict the extent of this visual change. The size and proximity of the turbines would dominate views from local residential areas, historical sites, and popular coastal locations. This would significantly affect visual amenity and undermine the landscape's defining features of naturalness and remoteness. The assessment fails to properly articulate the significance of these impacts within such a sensitive landscape.

There are serious methodological flaws in how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not adequately reflect the most sensitive receptors or the worst-case scenarios, particularly concerning critical cultural heritage sites and high-value landscapes. This raises concerns that the true magnitude of visual impact has been downplayed, compromising the assessment's reliability.

Additionally, there is a notable failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence, which leads to an incomplete understanding of how the proposal will impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are appreciated and severing their ties to the natural horizon. This is not merely a visual issue; it represents a wider cultural and spatial detriment that has not been properly evaluated in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural environments and historical assets. The scale of the proposed change fails to meet the necessity of preserving landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case scenario assessment further undermines any assertion of compliance with policy.

Moreover, it is evident that the impacts noted cannot be effectively mitigated. Given the height, scale, and proximity of the turbines, their presence would be imposing and inescapable. The anticipated changes are therefore fundamental and permanent, rather than amenable to acceptable levels of mitigation.

In summary, the assessment does not accurately reflect the magnitude of impact, the

sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings preclude a dependable evaluation and affirm the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is lacking in detail, making it difficult to evaluate potential environmental effects. There is substantial seabed preparation and installation work proposed in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on mitigation and contingency measures that would be prepared after consent is granted, which hampers any meaningful assessment of their effectiveness or adequacy.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly concerning. The West Lewis coastline is home to clean coastal waters and important habitats that could be impacted by sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on how these issues will be prevented, controlled, or monitored.

Additionally, there is uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential effects on marine species and habitats that are already known to be sensitive within the broader assessment.

The lack of detailed emergency response procedures further exacerbates these concerns. By postponing contingency planning until after consent is obtained, the application inhibits the evaluation of whether sufficient safeguards are in place to address pollution incidents. This creates procedural risk and undermines the competent authority's ability to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the Environmental Impact Assessment regime requirements. Significant effects and mitigation measures must be assessed prior to granting consent, and without this information, a lawful determination cannot be made. The application also 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 surrounding potential impacts result in a materially deficient assessment. These issues prevent a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, which are at risk due to the inadequacies of the assessment regarding fisheries and marine life. The application does not provide a comprehensive evaluation of the ecological or socio-economic impacts, failing to demonstrate that these crucial habitats and activities can be preserved without significant disruption.

A critical concern is the assumption made in the application that fishing activities can be displaced without any negative consequences. There is a lack of evidence to support claims that alternative fishing grounds are available, accessible, and capable of handling the added pressure. This omission carries significant implications, as displacement could lead to overfishing in other areas and potentially result in wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the impacts on fisheries and the livelihoods tied to them remain obscured.

Moreover, the proposal poses substantial risks to marine species, particularly through the underwater noise generated by construction activities. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life over considerable distances, notably affecting species such as dolphins. Concerns regarding the predicted disturbance to a significant portion of the local bottlenose dolphin population are serious, yet the application tends to downplay the significance of these effects without adequate supporting evidence.

An inconsistency arises within the application itself, acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously classifying these impacts as negligible. This contradiction casts doubt on the assessment's credibility and raises substantial concerns regarding compliance with the Habitats Regulations, especially in instances where harm is projected to an extent that necessitates legal authorisation.

Furthermore, the assessment fails to account for cumulative impacts from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an inclusive evaluation of these combined effects, the overall impact on marine ecosystems and socio-economic conditions remains undetermined.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Without a thorough assessment of these nocturnal effects, it is impossible to ascertain whether protected species or designated sites could be adversely impacted. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering a lawful determination. Furthermore, the failure to address these issues conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of night-time is an integral part of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential benchmarks. The concerns raised echo those from the 2008 refusal of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Now, this application arrives under a more stringent policy framework that prioritises biodiversity, peatland protection, landscape integrity,

and community wellbeing.

Critical gaps in baseline data undermine the application's evidential reliability. The use of an undefined design envelope and unspecified mitigation measures, alongside omissions regarding nocturnal wildlife impacts, the full scope of onshore infrastructure, and tourism effects, render the Environmental Impact Assessment incomplete. As a result, it fails to provide a comprehensive understanding of likely significant effects or any residual impacts.

Procedural failures further weaken the proposal. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment is a material omission that obstructs the competent authority's ability to evaluate effects on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal directly contradicts National Planning Framework 4, as it does not effectively demonstrate protection of biodiversity, natural places, and cultural heritage. It falls short in showing 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 impacts from both offshore and onshore components have not been adequately assessed, thereby obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

Moreover, the proposal would lead to substantial and irreversible changes to a highly sensitive landscape. Industrialisation along 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.

Considering these factors, the application is both procedurally and substantively unfit for determination. The scale of information deficiencies, coupled with conflicts in policy and unresolved environmental risks, hampers the ability to make a lawful, evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or activate relevant regulatory provisions to mandate the submission of the missing information.

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

Additional Comments

I am an indigenous member of my community here at Oldshoremore, Sutherland. I am also a registered Crofter, of land that my family moved to in 1820, after being burnt out of their homes at Strathnaver, where they'd been for over 400 years. My heritage and culture are my entire identity here at Oldshoremore. I paint pictures of this place and I write and sing songs about this place. We are known for our fishing and Crofting here, our spirituality and our stubborn fighting nature.

I live Directly across the water from this proposed wind farm site, and I will see it from my home and Croft, and possible here it.

Behind my house, on the common grazings land, there is also a proposed wind farm site here, of 18 giant turbines. This is to go on Crofting Common Grazing land. As a Crofter, I have legal rights to be able to stay living and working on my Croft. But if the Kinlochbervie wind farm arrives, the noise will cause my son and I great distress, due to our hearing sensitivities (on the autistic spectrum). If you bring the wind farm to Lewis or to the common grazings land behind my house on the Kinlochbervie estate, then you are breaching my human rights and insulting me and my sons very identity as indigenous humans living here.

I urge you, and the Scottish Govenrment to put a stop to any future wind farms. We already generate enough wind power.

Community run and owned renewable projects should be made compulsory. Any future foreign and multi million plains companies proposing wind farms on our indigenous Scottish land, needs to be stopped now!!!!

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: 6ED0B771

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an examination of the Environmental Impact Assessment Report and its accompanying documentation, revealing significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity. Concerns arise from the scale, proximity, and design of the proposed development, which appear incompatible with statutory requirements, national policy, and the principles of sustainable development.

A crucial issue lies in the inadequacy of the evidential basis provided for a lawful determination. Essential environmental data is absent, and the baseline information presented is limited and inconsistent. Moreover, critical aspects of the proposal remain undefined. The flexible design framework utilised obscures the understanding of potentially significant effects, and the reliance on unspecified mitigation measures renders their effectiveness impossible to evaluate. Consequently, the documentation does not facilitate a complete or informed understanding of the potential environmental, cultural, or community impacts. Assertions regarding negligible or non-significant effects lack robust supporting evidence.

Furthermore, there are substantial policy conflicts evident within the proposal. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate that national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. Such conflicts directly challenge the statutory tests required for consent and compromise the competent authority's capacity to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual dominance, and environmental impact, especially with the positioning of large turbines in close proximity to the shoreline. The combination of inadequate information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment pertaining to marine ecology and protected species within the West Lewis coastal environment is seriously lacking, failing to provide a complete and dependable understanding of ecological receptors in this biologically vibrant marine system. Inadequate baseline data and insufficient methodologies have led to a failure to accurately capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid evidential foundation necessary for evaluating potential impacts.

A critical shortfall pertains to otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. This oversight of their core foraging range and behavioural patterns results in an insufficient evaluation of the possible effects from construction disturbances, noise, and increased activity. Therefore, the conclusions drawn regarding the absence of significant effects on otters are fundamentally flawed.

Further issues arise in the analysis of basking sharks, where reliance on aerial surveys leads to significant detection bias, particularly in the Atlantic environment. Such an approach is likely to underestimate the presence of these species, especially when compared to well-documented land-based observations that demonstrate frequent utilisation of these waters. The failure to integrate or properly consider this relevant data culminates in an incomplete baseline and diminishes the validity of the conclusions.

These methodological shortcomings indicate that any assertions of negligible or non-significant effects are based more on assumptions than on rigorous evidence. Additionally, the lack of adequate baseline information hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This ambiguity raises concerns about the real scale of risks facing marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements set out by the Environmental Impact Assessment regime and National Planning Framework 4, as there has been inadequate identification and assessment of protected species. This uncertainty prohibits the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is unlawful to grant consent.

In summary, the combination of insufficient baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These inadequacies hinder a thorough evaluation of the impacts on marine ecology and protected species, leading to the overarching conclusion that the application lacks a robust evidential basis.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The application has significant shortcomings regarding the assessment of community rights and engagement. The Gaelic-speaking population has a distinct cultural identity

that aligns with characteristics of an Indigenous People. However, no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the assessment's legitimacy and disregards established principles of participation in decisions that affect cultural and environmental interests.

Moreover, the treatment of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, raises serious concerns. These sites are active places for burial and spiritual practice, yet they are inaccurately categorised as static features. This mischaracterisation fails to acknowledge their ongoing use and meaning, as well as the potential impact of development on their setting. Consequently, this results in an inadequate evaluation of cultural effects and neglects their importance in community life.

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This lack of

transparency creates a significant evidential gap that hinders the public and the competent authority from grasping the full extent of social risks revealed through the developer's own research. Available summaries highlight that residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are based on direct engagement and are therefore not speculative. Yet, the withholding of the complete assessment restricts proper scrutiny of the findings and limits the ability to evaluate their significance within the decision-making process.

Furthermore, the proposal is viewed as a direct threat to community identity and cohesion, with evidence of "cultural loss" identified in the developer's findings. Despite this, these impacts have not been adequately incorporated into the main application or given the necessary weight. The failure to disclose the full Social Impact Assessment thus obscures the true human and social cost of the development.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development is required to promote positive health outcomes and avoid harm, yet the evidence available suggests existing adverse effects that have not been fully disclosed. Without the complete assessment, compliance with this policy remains unproven.

The procedural implications are noteworthy. 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 constitutes a failure to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to adequately address the sensitivity of the environment and the scale of change anticipated. The West Lewis coastline, characterised by an open Atlantic horizon, an undeveloped character, and a profound sense of remoteness, would be fundamentally altered by the introduction of large-scale turbines in close proximity to the shoreline. This would create a continuous and dominant industrial presence, resulting in a permanent and irreversible transformation

of the landscape.

The application does not effectively convey the magnitude of the visual changes that would arise. The turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations, thereby impacting visual amenity and undermining the defining qualities of naturalness and remoteness. There is a concerning lack of clarity regarding the level of impact and its significance within the context of such a sensitive landscape.

Methodological issues also arise in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the visual impact has been understated, calling into question the reliability of the assessment.

Moreover, there is a failure to adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, linked visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated, neglecting their interdependence and leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, changing the context in which heritage assets are experienced and disrupting their connection to the natural horizon. This represents a visual impact as well as broader cultural and spatial harm that has not been sufficiently addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the absence of a comprehensive worst-case assessment further undermines any assertions of policy compliance.

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

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

TOURISM

The analysis of tourism impacts presented in the application is notably inadequate, failing to evaluate the economic and social ramifications for a pivotal sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscapes, dark skies, and the feeling of remoteness. The application itself states that 86% of visitors are attracted by the scenery, yet it lacks a quantifiable assessment of how the proposed large-scale offshore infrastructure might influence visitor numbers, their behaviour, or the overall economic contributions they make.

Tourism has seen considerable growth, rising from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, there is no modelling within the application regarding how the industrialisation of the seascape and the resulting decline in environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. Without such analysis, it is impossible to ascertain whether the proposed development would yield a net economic benefit or instead harm an established and expanding sector.

The failure to address the significance of environmental quality in sustaining tourism is evident, especially regarding how unspoiled landscapes and dark skies enhance the visitor experience, as well as their importance to emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortcoming, creating a critical void in understanding the impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly regarding economic impact and the necessity to establish net benefit. It is at odds with strategic objectives that highlight tourism as a priority growth sector and fails to furnish adequate evidence for the competent authority to assess the economic repercussions of the proposal.

Collectively, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviour, and recognise the island's economic dependency results in a significant evidential gap. This deficiency hinders a comprehensive evaluation of economic effects and leads to the conclusion that the application remains incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm illustrates a serious inadequacy in meeting the requirements for sustainable development, as measured against statutory obligations, national policy, and evidential standards. This application echoes the principal issues that led to the rejection of the Lewis Wind Power proposal

in 2008, where the unacceptable level of industrialisation was identified. Although the current proposal is being evaluated under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, it still fails to meet essential criteria.

There are glaring omissions in the evidential basis necessary for determination. The proposal lacks comprehensive baseline data and continues to operate within an undefined design envelope. Furthermore, it leans on unspecified mitigation measures and ignores critical impact pathways, such as those affecting nocturnal wildlife, the full scope of onshore infrastructure, and potential tourism repercussions. As a result, the Environmental Impact Assessment remains inadequate, failing to provide a thorough understanding of likely significant effects or residual impacts.

The application is marred by procedural shortcomings. The missing Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018, and the failure to provide the complete 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 resilience, rendering the application unsuitable for determination.

This proposal contradicts National Planning Framework 4. It does not illustrate adequate protection for biodiversity, natural spaces, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. Additionally, the lack of tourism impact modelling raises doubts about the assertion of a net economic benefit. The cumulative effects of both offshore and onshore components have not been sufficiently examined, leaving unclear implications for peatlands, carbon balance, habitats, and crofting land.

Uncertainties surrounding environmental risks persist and may be significantly impactful. The assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or internally inconsistent. The evidential burden needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle and obstructing any lawful conclusion regarding the acceptability of impacts.

Moreover, this proposal would lead to considerable and irreversible transformations to a particularly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disturbances to cultural and visual connections, and the repercussions for tourism represent enduring effects that cannot be adequately mitigated.

Overall, the application is fundamentally and procedurally unfit for determination. The myriad information deficiencies, alongside policy discrepancies and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority is compelled to either refuse consent based on these grounds or invoke relevant regulatory provisions to mandate the submission of the outstanding 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

This project will have a negative effect on Tourism, heritage and the 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: 271839C3

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

Dear Sir/Madam

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

A thorough examination of the Environmental Impact Assessment Report and associated documentation reveals significant deficiencies that hinder a lawful determination. There is a notable absence of critical environmental data, limited and inconsistent baseline information, and key aspects of the proposal that remain undefined. The flexible design framework employed prevents a clear understanding of the likely significant effects, while the reliance on unspecified mitigation measures renders their effectiveness impossible to assess. Consequently, the information provided does not enable a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

The proposal demonstrates clear and substantive conflicts with established policy frameworks. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It fails to show that national requirements for protecting biodiversity, climate interests, and environmental integrity can be satisfied. These conflicts directly undermine the statutory tests necessary for consent and impede the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal presents significant concerns regarding landscape capacity, visual dominance, and environmental impact, with large turbines positioned alarmingly close 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 cannot support a lawful determination. Given these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and does not offer a comprehensive, clear, or trustworthy account of the potential environmental

consequences of the proposed development. The reliance on a flexible Project Design Envelope, which lacks definitive turbine dimensions, layouts, or configurations, creates considerable uncertainty and hinders a reliable worst-case scenario analysis. This approach compromises the integrity of the assessment and implies that the projected impacts may not accurately represent the eventual development, which limits both public understanding and that of the competent authority regarding the actual environmental repercussions.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be articulated. As a result, consent is sought with the understanding that any environmental damage will be addressed later, which precludes any substantial assessment of effectiveness or residual impacts. This postponement of vital information to post-consent phases is procedurally unacceptable and contradicts the fundamental aims of the Environmental Impact Assessment framework, which stipulates that significant effects and mitigation strategies must be clearly outlined before any determination can be made.

Significant evidential shortcomings are also present, characterised by incomplete baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. Consequently, there is considerable uncertainty about the magnitude and significance of the impacts, particularly in cases where conclusions of negligible or non-significant effects are stated without adequate supporting data. The lack of sufficient information obstructs a clear assessment of cumulative and worst-case impacts and introduces scientific uncertainty that fails to align with statutory requirements.

As a result, the application does not satisfy the evidential standards mandated by the Habitats Regulations, which necessitate the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Moreover, the proposal does not demonstrate adherence to National Planning Framework 4, notably concerning biodiversity protection and environmental integrity, as it remains unproven that impacts have been comprehensively evaluated or that suitable safeguards are in place.

In conclusion, the combination of an undefined design envelope, lack 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 thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the information available.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a comprehensive assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned comparison of realistic alternatives based on their environmental consequences, the submission opts for a narrative that describes the

project's evolution. This method does not adequately demonstrate that less harmful options have been thoroughly identified, assessed, and selected over more damaging alternatives.

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 positioning turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. The sensitivity of the West Lewis coastline and the critical nature of proximity to shore in evaluating impact highlight the significance of this oversight. The absence of such analysis obstructs any determination that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where the evidence is insufficient to confirm that alternative routes have been adequately explored to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The failure to present a clear strategy for avoidance, coupled with the lack of comparative analysis, indicates that mitigation by design has not been effectively applied; rather, reliance has been placed on mitigation measures that occur post-design.

Consequently, the application does not demonstrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This signifies a failure to adhere to the established mitigation hierarchy, thereby obstructing the competent authority's ability to ascertain whether less harmful and more suitable alternatives exist. Without a rigorous alternatives assessment, it is not feasible to conclude that the proposal constitutes a sustainable or policy-compliant solution.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is significantly flawed and does not provide a thorough understanding of the ecological receptors involved. This marine system is biologically active and sensitive, yet the baseline data presented is incomplete, and the methodologies used fail to accurately capture the presence, behaviour, and habitat utilisation of various species. Consequently, the assessment lacks a solid evidential basis for evaluating potential impacts.

One major oversight pertains to otters, a European Protected Species. The application

does not sufficiently acknowledge their active use of coastal areas for foraging and movement. The assessment neglects to consider their core foraging ranges and behavioural patterns, which means the possible effects of construction disturbances, noise, and heightened activity have not been properly evaluated. This lack of attention undermines the findings concerning the absence of significant effects on this species.

Similarly, the assessment of basking sharks suffers from notable deficiencies, as it relies heavily on aerial surveys that introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, particularly when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline, further diminishing the reliability of the conclusions drawn.

These methodological shortcomings result in conclusions of negligible or non-significant effects that are based on assumptions rather than sound evidence. The insufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation creates uncertainty concerning the actual level of risk to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime or National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, granting consent would not be lawful.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a rich cultural landscape where the environment, language, tradition, and community are deeply intertwined. The assessment of cultural heritage and community identity is fundamentally inadequate, as it treats heritage merely as a collection of isolated and static assets, rather than recognising their ongoing social, cultural, and spiritual significance within the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are particularly overlooked. These sites serve as active places of burial and spiritual practice, yet they have been mischaracterised as static features in the assessment. This failure to acknowledge their continued use and the implications of development on their setting results in an incomplete evaluation of cultural effects, neglecting their vital role in community life.

Moreover, intangible cultural heritage, including the Gaelic language and traditions, as well as the long-standing relationship between the community and the coastal environment, is not assessed. These elements are essential to the area's identity and their absence represents a significant omission. Without this consideration, it becomes impossible to properly understand the cultural impact of the proposed development.

Concerns extend to community rights and engagement, particularly given that the Gaelic-speaking population holds a distinct cultural identity recognised as characteristic of an Indigenous People. The lack of a Free, Prior and Informed Consent process undermines the assessment's legitimacy, failing to uphold established principles of participation in decisions that affect cultural and environmental interests.

Compounding these issues is the critical procedural failure regarding the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to evaluate the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

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

Overall, the failure to properly 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, leaving the application without a solid basis for understanding the true cultural cost of the proposal.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks adequate detail for assessing construction and pollution risks, rendering the evaluation of likely environmental effects incomplete. It involves significant seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on future mitigation and contingency measures that will be prepared post-consent, hindering any meaningful assessment of their adequacy or effectiveness.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly troubling. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide sufficient information on preventative, controlling, or monitoring strategies.

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

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By deferring contingency planning until after consent is granted, the application undermines the ability to evaluate whether adequate safeguards are in place to manage pollution events. This introduces procedural risks and obstructs the competent authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the requirements established under the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures be assessed prior to consent; in the absence of such information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

Ultimately, the combination of undefined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts leads to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal involves significant onshore works, including cabling across protected moorland, the construction of a substation near Stornoway, and access infrastructure that traverses sensitive landscapes. These activities require excavation in areas of deep peat, particularly within Barvas Moor, which serves as an important carbon store and ecologically sensitive habitat. Unfortunately, the application fails to provide a thorough assessment of the impacts from these works, which inhibits a complete understanding of the overall environmental footprint of the project.

The assessment of onshore infrastructure remains materially incomplete, neglecting to consider the full extent of impacts that arise from what constitutes a single integrated project. The onshore and offshore elements are intrinsically linked, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects, preventing a proper evaluation of cumulative impacts. The Environmental Impact Assessment process mandates that all project components be considered together; however, the current separation means that the combined effects on peatlands, habitats, and local communities are not adequately understood.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are subject to protective policies. The application does not sufficiently demonstrate that impacts on these crucial habitats have been fully assessed or that appropriate measures to avoid such impacts have been implemented. This leads to a clear evidential gap regarding biodiversity protection.

Moreover, the proposal raises significant concerns about carbon balance. Disturbance of peatland may release stored carbon, potentially resulting in a carbon debt that contradicts the goals of renewable energy development. The application does not adequately address this critical issue or provide assurance that the overall carbon balance remains positive.

Additionally, the routing of infrastructure through active croft land introduces potential conflicts with established land use and legal rights. There is a lack of evidence in the application regarding the initiation of necessary consents or processes, which raises questions about the deliverability and lawful implementation of the proposal.

From a policy standpoint, the failure to assess the project in its entirety and to demonstrate protection for peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the integrity 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 portion of the application incomplete and unreliable, thereby preventing a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements for sustainable development when examined against statutory duties, national policy, and evidential standards. This application revisits the core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. The current application, despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, still falls short.

Critical gaps in baseline data render the evidential basis for determination incomplete and unreliable. The application relies on an undefined design envelope and unspecified mitigation measures, and it fails to address key impact pathways, including those related to nocturnal wildlife, full onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment lacks completeness and does not facilitate a comprehensive understanding of likely significant effects or residual impacts.

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

The proposal is in direct conflict with National Planning Framework 4, as it fails to protect biodiversity, natural places, and cultural heritage. It does not adequately demonstrate that health and wellbeing impacts are acceptable, nor does it provide evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative impact of both offshore and onshore elements has not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainty surrounds environmental risks, which could be significant. Incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals reveal internal inconsistencies. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding acceptable impacts.

This 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 negative impacts on tourism create permanent effects that cannot be adequately mitigated.

Collectively, these factors indicate that the application is procedurally and substantively unfit for determination. The extensive deficiencies in information, in conjunction with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. The competent authority should refuse consent based on these grounds or utilise the relevant regulatory provisions to mandate the submission of the missing information.

Accordingly, 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: F1E3482A

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 consideration under the marine licensing and Environmental Impact Assessment regulations. The objection is grounded in a thorough examination of the Environmental Impact Assessment Report and its supporting documents, highlighting deficiencies related to planning, environmental issues, cultural significance, and procedural integrity. Located off the west coast of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale, proximity, and design of the wind farm raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

A critical analysis reveals that the application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of key environmental data, while the baseline information provided is both limited and inconsistent. Moreover, many aspects of the proposal remain unclear. The flexible design framework employed hinders a comprehensive understanding of potential significant effects, and the reliance on unspecified mitigation measures means their effectiveness remains unassessed. Consequently, the documentation fails to facilitate a complete or informed understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects are not substantiated by robust evidence.

Furthermore, there are significant conflicts with established policies. The proposal seems to contradict the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not convincingly demonstrate adherence to national requirements for the protection of biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests necessary for consent and impede the competent authority's ability to determine the acceptability of the development from a policy perspective.

The scale of this proposal is unprecedented in the region, with large turbines planned in close proximity to the shoreline, raising substantial concerns about landscape capacity, visual impact, and broader environmental consequences. The collective effect of insufficient information, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance suggests that the application is incomplete and unfit to support a lawful determination. Under these circumstances, it is essential that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary depth and transparency, failing to provide a reliable overview of the potential environmental consequences of the proposal. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the assessment introduces substantial uncertainty. This lack of clarity undermines the integrity of the evaluation and obscures the actual impacts of the development, leaving both the public and the competent authority unable to fully grasp the environmental effects involved.

Consent for the application has been requested based on the understanding that environmental harm will be mitigated at a later stage, which compromises any meaningful assessment of the effectiveness of these measures and the residual impacts that may arise. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies are thoroughly established before a decision is made.

There are considerable deficiencies in the evidential basis, including notable gaps in baseline data, limitations in the employed methodology, and an overreliance on assumptions instead of site-specific evidence. Consequently, this generates uncertainty regarding the scale and significance of impacts, particularly where the report presents conclusions of negligible or non-significant effects without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case scenarios and introduces a level of scientific uncertainty that cannot comply with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which requires the exclusion of adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, since it cannot be evidenced that impacts have been adequately assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data lead to an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, ultimately leaving the competent authority unable to make an informed determination 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 coastal environment of West Lewis is a highly sensitive and biologically active marine system. However, the assessment of marine ecology and protected species conducted in relation to this area is materially deficient, failing to provide a complete or reliable understanding of the ecological receptors involved. The baseline data is incomplete, and the methodologies employed do not adequately capture crucial information regarding species presence, behaviour, and habitat use. Consequently, the conclusions drawn do not rest on a sound evidential basis for evaluating potential impacts.

Particularly concerning is the omission of otters, which are a European Protected Species. The application neglects to properly recognise and assess their active use of coastal areas for foraging and movement. This oversight in considering their core foraging range and behavioural patterns means that the potential effects of construction-related disturbance, noise, and increased activity have not been properly

evaluated. As a result, the assessment's conclusions regarding the absence of significant effects on otters are undermined.

Further shortcomings arise in the evaluation of basking sharks. The reliance on aerial surveys introduces significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the actual presence of these sharks, particularly when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or adequately consider such data leads to an incomplete baseline and undermines the reliability of the conclusions presented.

These methodological deficiencies mean that the claims of negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of sufficient baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, consent cannot be granted lawfully.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is fundamentally insufficient, neglecting the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. The application adopts a simplified viewpoint, treating heritage as isolated, static assets rather than recognising their ongoing social, cultural, and spiritual roles within the community.

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

Additionally, the application neglects the intangible aspects of cultural heritage, which include the Gaelic language, traditions, and the enduring relationship between the

community and the coastal environment. These factors are vital to the area's identity but are entirely omitted from the assessment, creating a significant gap. Without considering these elements, the cultural impact of the development cannot be adequately understood.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not truly reflect the extent of change or the sensitivity of the environment. The coastline of West Lewis is characterised by its expansive Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would lead to a continuous industrial presence, fundamentally changing this character and resulting in a permanent transformation of the landscape.

The application fails to convey the true magnitude of the visual change. Due to their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately reflect this level of impact or its significance within such a sensitive landscape.

Moreover, there are serious methodological issues concerning the selection and

presentation of visual viewpoints. Evidence indicates that the viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the concern that the magnitude of the visual impact may have been understated, which compromises the assessment's reliability.

Another critical deficiency is the lack of assessment regarding the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that connects visually and spatially to the Atlantic horizon. The assessment views these as isolated assets, ignoring their interdependence, which results in a limited evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, altering how heritage assets are experienced and disrupting their connection to the natural horizon. This presents not just a visual impact but a broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal contradicts National Planning Framework 4 regarding the protection of natural places and historic assets. The scale of change is at odds with the need to maintain landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further weakens any claims of policy compliance.

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

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, yet the assessment of fisheries and marine life within the application is inadequate and lacks a thorough evaluation of both ecological and socio-economic impacts. A key concern is the assumption made in the application that fishing activities can be displaced without any consequences. There is no evidence presented to support the availability or accessibility of alternative fishing grounds that can withstand additional pressure. This significant omission raises the risk of overfishing in other areas, which may have broader economic repercussions for the local fishing fleet. Consequently, without a clear, evidence-based assessment, the implications for fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during the construction phase. The prolonged high-energy hammer piling is likely to cause disturbances over considerable distances, impacting species such as dolphins. Concerns arise from the predicted disturbance to a considerable portion of the local bottlenose dolphin population, yet the application tends to downplay these effects, lacking sufficient supporting evidence.

Additionally, there is an inconsistency within the application itself, as it acknowledges the need for licences to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. The absence of a comprehensive evaluation of these combined effects hinders any determination of the overall impact on marine ecosystems and socio-economic conditions.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is renowned for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism value. However, the proposal introduces permanent red aviation lighting that will create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This is particularly concerning given the rising importance of dark skies to the identity of the area and the emerging tourism sector centred around astro-tourism.

Moreover, the application neglects to assess the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The absence of a lighting impact

assessment or phototaxis study means that the application does not consider how aviation lighting may negatively affect these species or contribute to increased mortality.

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

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

From a policy standpoint, the omission contradicts National Planning Framework 4, which pertains to the protection of natural places and environmental quality. It also undermines the overall evaluation of landscape and seascape impacts, as the character of the night-time environment is a crucial component of the ecosystem.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its adherence to the principles of sustainable development, failing to meet statutory duties, national policy, and evidential standards. It mirrors the critical issues that were present in the 2008 refusal of the Lewis Wind Power proposal, where the scale of proposed industrialisation was deemed unacceptable. Despite being put forward under a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application does not adequately address these vital areas.

Key deficiencies characterise the evidential basis for determination. The baseline data is notably incomplete, and there is an unresolved reliance on an undefined design envelope. The proposed mitigation measures lack specification, and there is a concerning omission of essential impact pathways, which includes the effects on nocturnal wildlife, comprehensive onshore infrastructure, and tourism impacts. This results in an Environmental Impact Assessment that is insufficient, leaving a lack of clarity on significant effects or residual impacts.

Moreover, procedural oversights are evident throughout the application process. The failure to conduct a compliant Island Communities Impact Assessment breaches

statutory obligations under the Islands (Scotland) Act 2018, and the omission of the full Social Impact Assessment is a material deficiency. These shortcomings hinder the competent authority's ability to evaluate potential effects on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

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

Environmental risks associated with the project are uncertain and could be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent at times. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, thus engaging the precautionary principle and precluding a lawful determination that impacts are acceptable.

Substantial and irreversible alterations to a highly sensitive landscape would also result from the proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruption to cultural and visual relationships, and adverse impacts on tourism indicate permanent consequences that cannot be mitigated to an acceptable extent.

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

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

Additional Comments

No Scottish government minister should override local objections, they are elected to serve the sovereign Scottish people not the lobby groups corporate or foreign governments.

Any large scale wind farms should have a non negotiable 10% on going share in the profits otherwise no planning permission should be granted.

And something this large should never be allowed so close to shore, reducing the cost is not the priority.

Wind farms should not be getting paid not to turn because of lack of interconnector capacity, if they can't lay a larger capacity interconnector a hydrogen production plant must be a condition which would allow all the community wind farms to generate funds 24/7 and make our island self sufficient in fuel, large scale battery plants are not the solution, green hydrogen is the future and Scotland can't miss this opportunity to combine these elements together for our island for Scotland

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: 9DD120A0

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 being processed under the relevant marine licensing and Environmental Impact Assessment regulations. The objection is founded on a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. This development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural identity. The proposal's scale, proximity, and design raise essential concerns about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful decision. It is missing critical environmental data, with baseline information being limited and inconsistent. Additionally, vital elements of the proposal remain undefined. The use of a flexible design framework hinders 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 allow for a comprehensive understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

There are evident and serious conflicts with existing policies. The proposal appears at odds with 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 compliance with national requirements to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly challenge the statutory tests necessary for obtaining consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

The scale of the proposal is unprecedented for this area, with large turbines positioned near the shoreline, raising significant concerns about landscape capacity, visual impact, and environmental repercussions. The combination of inadequate information, reliance on undefined mitigation, weaknesses in evidence, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, resulting in an inadequate and opaque account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which lacks

commitment to specific turbine dimensions, layouts, or configurations, creates considerable uncertainty. This lack of precision hinders the ability to consistently apply a worst-case scenario and diminishes the reliability of the assessment. Consequently, the impacts outlined may not accurately represent the actual development, leaving both the public and the competent authority unable to fully comprehend the true extent of environmental effects.

Additionally, the application's heavy reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans leads to consent being sought on the premise that environmental harm will be addressed after approval. This deferral of essential information to post-consent stages is unacceptable from a procedural standpoint and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Moreover, there are notable evidential shortcomings, including gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such deficiencies introduce uncertainty about the scale and significance of impacts, especially 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, resulting in scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential standards established under the Habitats Regulations, failing to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not 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, unspecified mitigation measures, and data gaps renders the Environmental Impact Assessment Report incomplete and unreliable. These deficiencies inhibit a lawful and thorough evaluation of environmental effects, preventing the competent authority from making an informed decision based on the available information.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding the assessment of marine ecology and protected species, which is notably inadequate and fails to offer a complete or reliable understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidential support for evaluating impacts.

A critical oversight pertains to otters, a species protected under European law, as the

application inadequately acknowledges and assesses their active use of coastal areas for foraging and movement. The lack of examination of their core foraging range and behavioural patterns leads to an inadequate assessment of potential effects stemming from construction disturbances, noise, and increased activity. This gap undermines any conclusions regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks suffers from reliance on aerial surveys, which introduces substantial detection bias, particularly under Atlantic conditions. Such an approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider these data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The degree of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the assessment's deficiencies, characterized by incomplete baseline data, flawed methodologies, and unsupported conclusions, render it unreliable. These issues obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application under consideration presents a fundamentally flawed ornithological assessment, characterised by significant gaps in evidence and internal inconsistencies that severely undermine its conclusions. The proposed development is situated within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already facing decline. However, the application fails to satisfy the required evidential standard to demonstrate that these species will not be adversely affected.

A critical contradiction lies within the application itself; the developer asserts that there will be no significant adverse effects while also pursuing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This incongruity raises serious doubts about the reliability of the assessment and suggests

that the conclusions drawn are not substantiated by the underlying evidence. Furthermore, the assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It neglects to fully account for the importance of these feeding grounds, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning 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 fails to thoroughly assess the long-term consequences of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

Regulatory compliance is also called into question, as the application does not meet the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, means that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, obstructing a lawful conclusion in favour of consent. Additionally, the deficiencies identified represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to convincingly demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to internal inconsistency, methodological flaws, and insufficient evidence. These shortcomings obstruct a thorough evaluation of impacts and contribute to the overarching conclusion that the application fails to meet the statutory requirements essential for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment is a critical concern that affects the community's ability to understand the potential consequences of the proposed development. Although the developer conducted a Social Impact Assessment, including discussions with local residents, the comprehensive report has not been made publicly available. This absence creates a substantial evidential gap, hindering both public insight and the competent authority's assessment of the social risks highlighted by the developer's own research.

Residents are reportedly experiencing significant stress, anxiety, and worry due to the scale and proximity of the proposal. These impacts are directly informed by local engagement and should not be dismissed as mere speculation. However, the failure to release the full report restricts thorough examination of these findings and limits the capacity to evaluate their importance in the decision-making process.

Furthermore, the proposal is perceived to pose a direct threat to the community's identity and cohesion, with "cultural loss" noted in the findings submitted by the developer. Nevertheless, these critical impacts have not been adequately addressed within the main application, nor have they been given the consideration they merit. By withholding the complete Social Impact Assessment, the developer obscures the genuine human and social costs of the development.

This lack of disclosure undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when they may affect community character and functioning. The application falls short of providing a complete evidential foundation for weighing the benefits against the potential harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm, yet the evidence currently available suggests the presence of adverse effects that have not been fully revealed. Without the full assessment, it is impossible to confirm compliance with these policy requirements.

The procedural ramifications of these issues are considerable. The competent authority is unable to conduct a robust evaluation of socio-economic and health impacts without access to the complete Social Impact Assessment, which represents a significant oversight within the application and a failure to satisfy the evidential criteria of the Environmental Impact Assessment framework.

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing negative impacts, leads to an incomplete and unreliable assessment. This situation inhibits a lawful determination and further supports the view that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped landscape, and profound sense of remoteness. This development would introduce a continuous and dominant industrial presence that fundamentally alters the region's character, leading to a permanent and irreversible transformation of the landscape.

The assessment of visual impacts associated with this proposal is significantly lacking, failing to accurately represent the magnitude of change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, severely affecting visual amenity and undermining the region's defining qualities of naturalness and remoteness. There is a clear failure to convey the extent of these impacts and their significance in relation to the sensitive nature of the landscape.

Methodological flaws further compromise the assessment, particularly in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not adequately capture the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns about the accuracy of the reported visual impact and questions the reliability of the overall assessment.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently addressed. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape interconnected with the Atlantic horizon. The assessment treats these heritage assets as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any claims of policy compliance.

Finally, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, not reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents a significant deficiency in the assessment of construction and pollution risks, lacking the necessary detail to evaluate potential environmental effects. Notably, it involves extensive seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide 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, which obstructs a meaningful assessment of their adequacy and effectiveness.

This reliance on undefined future measures is especially troubling given the sensitivity

of the surrounding environment. The West Lewis coastline is characterised by 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 lacks sufficient detail on the strategies to prevent, control, or monitor these incidents.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of such impacts. This uncertainty also encompasses the potential effects on marine species and habitats identified as sensitive within the broader assessment context.

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning to a post-consent phase, the application fails to allow for an evaluation of whether adequate safeguards are established to address pollution events. This introduces procedural risk and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the postponement of essential environmental safeguards stands in conflict with the stipulations of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be evaluated prior to consent; without this information, a lawful determination cannot be reached. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These inadequacies hinder a thorough evaluation of construction and pollution risks and substantiate the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment regarding fisheries and marine life lacks depth, failing to deliver a thorough evaluation of the ecological and socio-economic impacts involved. The region off the West Lewis coast is home to a vibrant marine ecosystem and a thriving fishing industry. However, the application does not prove that these valuable habitats and activities can be preserved or maintained without considerable disruption.

One significant concern is the presumption that fishing activities can be relocated without repercussions. The submission does not provide any evidence to suggest that alternative fishing grounds are available, accessible, or able to bear additional pressure. This oversight is critical, as the risk of displacement could lead to overfishing in other areas and result in broader economic ramifications for the local fishing fleet. Without a precise and evidence-based examination, the consequences for fisheries and the livelihoods dependent on them remain unclear.

The proposal also presents serious risks to marine species, especially due to the underwater noise generated during construction. Extended periods of high-energy hammer piling are expected to cause disturbances over considerable distances, adversely impacting species like dolphins. There are significant concerns regarding the predicted disturbance to a considerable portion of the local bottlenose dolphin population; nonetheless, the application minimizes these concerns without adequate supportive evidence.

Additionally, there exists a notable inconsistency within the application, which acknowledges the necessity for licenses to permit harm to European Protected Species while simultaneously claiming that the impacts are negligible. This contradiction undermines the validity of the assessment and raises questions about adherence to the Habitats Regulations, especially in scenarios where harm is predicted to such a degree that it requires legal authorisation.

The assessment also neglects to account for cumulative impacts stemming from various pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 or the National Marine Plan. It does not adequately show that the development can coexist with current marine users or prevent unacceptable repercussions on marine biodiversity, hindering any conclusion that the proposal embodies sustainable development.

In summary, the absence of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions present in the application culminate in an assessment that is incomplete and unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is fundamentally inadequate and does not encompass the full range of impacts stemming from what is a singular, integrated project. The offshore turbines are fundamentally connected to the onshore works, yet they are evaluated separately, leading to a disjointed approach that obscures the true magnitude of the environmental and socio-economic repercussions.

Onshore components include cabling that crosses protected moorland, the construction of a substation in proximity to Stornoway, and the development of access infrastructure through sensitive landscapes. These activities necessitate excavation in areas characterised by deep peat, particularly within Barvas Moor, which is a crucial carbon store and an ecologically fragile habitat. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the

overall environmental footprint of the project.

By omitting or postponing the evaluation of onshore impacts, the application inhibits a proper analysis of cumulative effects. The Environmental Impact Assessment process mandates that all elements of a project are considered collectively, yet the separation of offshore and onshore aspects leads to an incomplete understanding of the combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not sufficiently demonstrate that the effects on these habitats have been thoroughly assessed or that suitable avoidance measures have been put in place. This creates a notable evidential gap in relation to biodiversity protection.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application does not provide proof that necessary consents or processes have been initiated, which brings into question the deliverability and lawful execution of the project.

From a policy standpoint, the failure to evaluate the project in its entirety and to show protection for 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 compromises the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife 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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development, as required by statutory duties, national policy, and evidential standards. It mirrors the key concerns that led to the refusal of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the extent of industrialisation. This new application, however, is presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis provided for the application is neither complete nor reliable. Significant gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Additionally, the reliance on unspecified mitigation measures and the exclusion of critical impact pathways—such as those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism—highlight the incompleteness of the Environmental Impact Assessment. Consequently, this assessment does not allow for a comprehensive understanding of the likely significant effects or residual impacts.

There are evident procedural shortcomings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to present the full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These issues collectively render the application unfit for determination.

In addition, the proposal contradicts National Planning Framework 4. It does not adequately protect biodiversity, natural places, and cultural heritage, nor does it demonstrate that health and wellbeing impacts are acceptable. The absence of tourism impact modelling further fails to establish a net economic benefit. The cumulative effects of both offshore and onshore components have not been properly assessed, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land inadequately understood.

The environmental risks associated with this proposal remain uncertain and could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are both incomplete and inconsistent in places. The evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle, preventing a lawful conclusion regarding the acceptability of impacts.

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

Overall, the application is procedurally and substantively unfit for determination. The combination of information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or utilise the appropriate regulatory measures to compel the submission of the missing information.

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

Additional Comments

I object to the proposed offshore windfarm as there are no benefits to me or the island, with regard to cheaper electricity.

This development would introduce industrial-scale structures into a coastal landscape valued for its natural beauty. It will permanently alter the character of the coastline where I live and all for what, for the benefit of a big multi-national company.

Even at offshore distances, turbine arrays can be highly visible, especially in clear weather and at night when aviation lighting is required.

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: E0525356

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

Dear Sir/Madam

This letter presents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is informed by a review of the Environmental Impact Assessment Report and associated documents, 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 known for its Atlantic-facing coastline, relatively untouched environment, and strong cultural significance. The proposal's scale, proximity to the shoreline, and design raise serious questions about its alignment with statutory obligations, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for a lawful assessment. Important environmental data is absent, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal remain undefined. The reliance on a flexible design framework hinders a clear understanding of potential significant effects, and the unspecified mitigation measures prevent an evaluation of their effectiveness. Consequently, the documentation does not facilitate a complete or informed understanding of the potential environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidential support.

The proposal exhibits clear and substantial conflicts with policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and public health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests required for consent and weaken the ability of the competent authority to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal, with large turbines located close to the shoreline, raises considerable concerns about landscape capacity, visual impact, and overall environmental consequences. When considering the insufficient information provided, the reliance on undefined mitigation, the weaknesses in evidence, and the clear conflicts with policy, it is evident that the application is incomplete and unable to support a lawful determination. Therefore, the precautionary principle must be applied in this context.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, lacking a thorough and reliable account of the environmental implications of the proposal. A flexible Project Design Envelope has been employed, which does not commit to specific turbine dimensions, layouts, or configurations. This introduces considerable uncertainty and hinders the application of a worst-case scenario, ultimately undermining the assessment's integrity. As a result, the impacts outlined may not truly represent the development as it will ultimately be constructed, leaving both the public and the competent authority without a clear understanding of the potential environmental consequences.

The application heavily depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed later is unacceptable, as it obstructs a meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This approach is contrary to the core purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

There are significant gaps in evidence, including deficiencies 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 impacts, especially where claims of negligible or non-significant effects are made without robust supporting data. The lack of comprehensive information leads to an unclear understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold established 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. Furthermore, the proposal does not comply with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it is evident that impacts have not been fully assessed nor have appropriate safeguards been established.

When considered collectively, the reliance on an undefined design envelope, the absence of specified mitigation, and the gaps in baseline data culminate in an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects and leave the competent authority unable to make an informed decision based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is inadequate, failing to provide a complete and reliable understanding of ecological receptors in this sensitive marine area. The methodologies employed do not effectively capture crucial aspects such as species presence,

behaviour, and habitat use, leading to an incomplete baseline dataset. This deficiency undermines the foundation necessary for evaluating potential impacts.

A notable oversight is the assessment of otters, which are classified as a European Protected Species. The application neglects to properly acknowledge their active use of coastal regions for foraging and movement. Consequently, the assessment lacks consideration of their core foraging range and behavioural patterns, leaving the potential impacts of construction disturbance, noise, and increased human activity unassessed. This failure to evaluate these factors calls into question any conclusions drawn regarding the absence of significant effects on otters.

The evaluation of basking sharks also presents significant deficiencies, as the reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. This method likely underestimates the presence of these sharks, especially when compared to established land-based observations that demonstrate their frequent utilisation of these waters. The lack of incorporation of such data contributes to an incomplete baseline, further undermining the reliability of the conclusions presented.

As a result of these methodological shortcomings, the claims of negligible or non-significant effects are based more on assumptions than on solid evidence. Additionally, the insufficiency of baseline data hampers the ability to assess cumulative and indirect impacts effectively, which encompass seasonal variations and broader ecosystem interactions. This situation generates uncertainty about the actual risks posed to marine species and their habitats.

Regulatory compliance issues arise as the application does not satisfy the requirements established by the Environmental Impact Assessment framework and the National Planning Framework 4, since protected species have not been properly identified or assessed. The uncertainty introduced prevents the exclusion of adverse effects beyond a reasonable scientific doubt, activating the precautionary principle. Therefore, consent for the proposed application cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions results in an unreliable assessment. These critical deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks 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 experiencing decline. The application fails to demonstrate that these species will not be adversely affected, and this omission is particularly concerning given that the development is situated within key foraging areas and migratory pathways. The ornithological assessment is significantly flawed, containing considerable gaps in evidence and inconsistencies that undermine its

conclusions.

A contradiction exists where the developer asserts there will be no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case, which should only be necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that its conclusions are not underpinned by solid evidence. Furthermore, the assessment does not provide adequate proof that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly acknowledged, and the reliance on modelling techniques adds uncertainty, particularly for species like Kittiwakes and Fulmars that are already in severe decline. The methodologies employed are likely to underestimate potential mortality, especially when baseline data is incomplete and the behavioural responses of the species are not fully understood.

The location of the turbines within a recognised migratory corridor poses an additional risk, essentially creating a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application lacks a comprehensive assessment of the long-term consequences of sustained mortality in this corridor and its potential effects on species with relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential requirements needed to confirm no adverse effect on the integrity of protected sites. The presence of conflicting conclusions, coupled with data deficiencies and limitations in the modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This situation engages the precautionary principle and hinders a lawful conclusion in favour of consent.

Overall, the identified deficiencies signify a failure to adhere to National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse impacts places the proposal in direct opposition to national policy. In conclusion, the assessment is deemed unreliable due to internal inconsistencies, methodological shortcomings, and insufficient evidence, which together prevent a robust evaluation of the potential impacts and lead to the conclusion that the application does not satisfy the statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is deeply flawed, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are interwoven. The application simplifies heritage to isolated, static assets, neglecting their active social, cultural, and spiritual roles within the community.

A significant oversight is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are not merely static

features; they serve as active sites of burial and spiritual practice. The assessment overlooks their ongoing use and significance, leading to a distorted understanding of the cultural effects and ignoring their importance in community life.

Moreover, there is a glaring omission regarding intangible cultural heritage, including the Gaelic language, local traditions, and the enduring connection between the community and its coastal environment. These crucial elements, central to the area's identity, are not considered in the assessment, which hampers a proper understanding of the development's cultural impact.

Concerns extend to community rights and engagement. The Gaelic-speaking population, with its unique cultural identity acknowledged as that of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack of meaningful participation undermines the assessment's credibility and fails to comply with established principles regarding community involvement in decisions impacting cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, represents a critical procedural failure. This omission prevents the competent authority from fulfilling its legal obligation to assess the social, cultural, and economic impacts on the island community, rendering any determination unlawful.

From a policy standpoint, these shortcomings conflict with the requirements of the National Planning Framework 4, particularly concerning the safeguarding of historic assets and places. The neglect of both tangible and intangible heritage, along with the dismissal of living cultural practices, marks a significant deviation from policy mandates.

Collectively, the failure to evaluate living heritage, intangible cultural values, community rights, and statutory responsibilities leads to a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, resulting in the application lacking a solid foundation for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The evaluation of social impacts, health, and wellbeing associated with the proposed development is fundamentally inadequate and lacks the necessary transparency for a lawful review. Although the developer has commissioned a Social Impact Assessment, including focus group discussions with local residents, the full report remains unpublished. This creates a critical evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified by the developer's own investigation.

Residents are already reporting measurable levels of stress, anxiety, and concern linked to the scale and proximity of the proposal, as derived from direct engagement

and therefore not speculative in nature. However, the absence of the complete assessment limits proper scrutiny of these findings and curtails the capacity to assess their implications during the decision-making process.

Moreover, there is evidence indicating that the proposal is viewed as a threat to community identity and cohesion, with the developer acknowledging the potential for "cultural loss" in its findings. Despite this recognition, the impacts have not been sufficiently incorporated into the main application or afforded the appropriate weight in consideration. The failure to release the full Social Impact Assessment obscures the real human and social costs tied to the development.

This lack of transparency undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health consequences is critical for developments of this magnitude, especially when community character and functionality may be at risk. The omission of the full dataset prevents the application from presenting a robust evidential foundation for weighing the benefits against the potential harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments are expected to promote positive health outcomes and mitigate harm; however, the available evidence reveals existing adverse effects that have not been adequately disclosed. Without access to the complete assessment, demonstrating compliance with this policy remains impossible.

The procedural ramifications are considerable. The competent authority is unable to carry out a thorough socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a significant shortcoming within the application and fails to satisfy the evidential requirements stipulated by the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal for the introduction of large-scale turbines near the West Lewis coastline raises significant concerns regarding its impact on seascape, landscape, and visual integrity. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a profound sense of remoteness. The presence of these turbines would lead to a continuous industrial presence that fundamentally changes this character, resulting in a permanent and irreversible transformation of the landscape.

The application does not adequately illustrate the extent of the anticipated visual change. The turbines' size and proximity would dominate views from residential areas,

historic sites, and popular coastal locations. This would detract from visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to convey the significance of this impact in a landscape of such sensitivity.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that certain viewpoints may not accurately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This suggests that the magnitude of the visual impact may be understated, casting doubt on the assessment's reliability.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape that is visually and spatially linked to the Atlantic horizon. Treating these sites as isolated entities disregards their interdependence and leads to an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This results in not only visual repercussions but also a more profound cultural and spatial degradation that has not been adequately addressed in the application.

From a policy standpoint, the proposal conflicts with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The proposed changes are at odds with the necessity to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the identified impacts cannot be effectively mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant. Thus, the resultant change is fundamental and permanent, not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, the assessment fails to represent the full extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a reliable evaluation and strengthen the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal entails significant seabed preparation and installation works within a high-energy Atlantic environment, yet there is a notable absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This results in an incomplete assessment of construction and pollution risks, which fails to provide the necessary detail to evaluate the likely environmental effects. The application relies on future mitigation and contingency measures that are yet to be defined, precluding any meaningful assessment of their adequacy or effectiveness.

Concerns are amplified by the sensitivity of the West Lewis coastline, which supports clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it lacks sufficient detail on how these risks will be prevented, controlled, or monitored.

Moreover, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from the 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 could affect marine species and habitats already recognised as sensitive in the broader assessment.

The deficiencies extend to the absence of detailed emergency response procedures, which further complicates the evaluation process. Deferring contingency planning to a post-consent stage introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, this deferral of essential environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be assessed prior to consent, and without such information, a lawful determination cannot be achieved. Furthermore, the application fails to demonstrate compliance with policy requirements relating to environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts contribute to a materially deficient assessment. These issues hinder a robust evaluation of construction and pollution risks and substantiate the conclusion that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. Such omissions are significant, particularly given the growing importance of dark skies to the region's identity and emerging sectors like astro-tourism. The lack of consideration for these impacts leads to a notable gap in the overall landscape and environmental assessment.

Additionally, the application does not assess the potential effects of this lighting on

nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. There is no lighting impact assessment or phototaxis study included in the application, leaving unaddressed how aviation lighting may affect these species or contribute to increased mortality rates.

The reliance on daytime survey data in the ornithological assessment further complicates matters, as it fails to capture nocturnal activity or associated risks. Kittiwakes, which may forage or migrate during the night, are similarly vulnerable to disorientation caused by artificial lighting, yet this risk remains unexamined. Without site-specific night-time data, understanding the ecological impacts becomes severely limited.

The absence of any evaluation of nocturnal impacts prevents a clear determination of whether protected species or designated sites would face adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is not met, invoking the precautionary principle and hindering lawful determination.

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development, as it does not satisfy statutory duties or national policy. This proposal raises the same concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Despite a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application still falls short.

There are significant gaps in the evidential basis provided for this application. It lacks comprehensive baseline data and continues to rely on an undefined design envelope. Mitigation measures have not been clearly specified, and important impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been overlooked. As a result, the Environmental Impact Assessment is inadequate, leaving uncertainties about the likely significant effects and any residual impacts.

Furthermore, procedural failures are evident. The lack of a compliant Island

Communities Impact Assessment breaches the statutory duties outlined in the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a significant omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal conflicts with the National Planning Framework 4. It does not demonstrate adequate protection of biodiversity, natural places, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, particularly due to the lack of tourism impact modelling. Moreover, the cumulative impact of both offshore and onshore elements has not been properly assessed, concealing effects on peatlands, carbon balance, habitats, and crofting land.

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

The proposed development 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 impact on tourism represent permanent changes that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination both procedurally and substantively. The numerous deficiencies in information, combined with conflicts in policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

Please do not have this happen in this untouched stunning place it is criminal

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: DBCADA89

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

Dear Sir/Madam

This objection is formally lodged against the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development's location off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity, raises significant issues. The scale, proximity, and design of the proposal present fundamental concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

An adequate evidential basis for a lawful determination is lacking, as critical environmental data is missing and baseline information is both limited and inconsistent. Key elements of the proposal remain undefined. The flexible design framework utilised prevents a clear understanding of likely significant effects, and without specified mitigation measures, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects lacking robust evidence.

Substantive policy conflicts are evident, as the proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly affect the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

Unprecedented in scale for this location, the proposal features large turbines positioned close to the shoreline, leading to serious concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the absence of sufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is lacking in material detail and fails to deliver a comprehensive, transparent, or trustworthy account of the potential environmental impacts associated with the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific turbine dimensions,

layouts, or configurations, introduces considerable uncertainty. This approach hinders the consistent application of a worst-case scenario, thereby compromising the integrity of the assessment and obscuring the true extent of environmental effects from both the public and the competent authority.

Moreover, the application depends significantly on mitigation measures, monitoring strategies, and management plans that have not been clearly outlined. Seeking consent under the premise that environmental harm will be addressed at a later stage obstructs any meaningful evaluation of effectiveness or residual impact assessment. This postponement of essential information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies are clearly established prior to the determination process.

There are also major evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This creates uncertainty around the scale and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory requirements.

Consequently, the application does not satisfy the evidential standard necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, specifically concerning 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 reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a well-informed decision based on the information currently available.

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to meet the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it inadequately identifies and assesses protected species. The assessment of marine ecology and protected species presents significant deficiencies, particularly concerning the understanding of ecological receptors within the West Lewis coastal environment. This area represents a highly sensitive and biologically active marine system, yet the baseline data remains incomplete, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat use. Consequently, the conclusions drawn lack a

sound evidential basis for evaluating potential impacts.

A notable shortcoming pertains to otters, classified as a European Protected Species, where the application does not adequately acknowledge their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an inadequate assessment of the potential impacts of construction disturbance, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on this species.

Furthermore, the assessment of basking sharks reveals additional deficiencies, as reliance on aerial surveys introduces considerable detection bias, particularly in Atlantic conditions. This methodological approach is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations indicating frequent use of these waters. The omission of relevant data further contributes to an incomplete baseline, weakening the reliability of the conclusions presented.

These methodological limitations result in assessments of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, thus generating uncertainty regarding the true scale of risk to marine species and habitats.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions compromises the reliability of the assessment. These shortcomings inhibit a thorough evaluation of impacts on marine ecology and protected species, ultimately leading to the conclusion that the application does not possess a sufficient evidential foundation. In light of the uncertainty introduced, it cannot be reasonably concluded that adverse effects can be excluded beyond reasonable scientific doubt, thereby engaging the precautionary principle and indicating that consent cannot be lawfully granted.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment's deficiencies are significant and demonstrate a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The proposal is in direct conflict with national policy, as it cannot adequately show that internationally important seabird populations will remain unaffected.

The application fails to meet the evidential threshold required to determine that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, which prohibits a lawful conclusion in favour of consent.

The assessment lacks sufficient evidence concerning the seabirds associated with protected sites such as the Lewis Peatlands and St Kilda. The importance of these feeding grounds is not fully taken into account, and the reliance on modelling introduces uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies applied are likely to underestimate mortality, especially given that baseline data is incomplete and behavioural responses are not fully understood.

Moreover, the siting of turbines within a recognised migratory corridor poses a significant risk by creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality within this corridor or the potential effects on species with relatively small global populations.

There exists a fundamental contradiction within the application; the developer asserts that there are no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically necessitated only when significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence presented.

Overall, the assessment is fundamentally flawed, characterised by internal inconsistency, methodological weaknesses, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage associated with the West Lewis coastline is critically flawed. It fails to acknowledge this area as a dynamic cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead, the application reduces heritage to a series of static assets, neglecting their continuing social, cultural, and spiritual significance for the local community.

A notable shortcoming in the assessment pertains to culturally important sites such as the cemeteries located at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual significance; however, the application inaccurately categorises them as static features without recognising their ongoing relevance and the potential impacts of development on their surroundings. This mischaracterisation leads to an incomplete understanding of cultural implications and overlooks their vital role in community life.

Furthermore, the application disregards the intangible aspects of cultural heritage, such as the Gaelic language, local traditions, and the community's historical relationship with the coastal environment. These elements are essential to the area's identity and are entirely omitted from the assessment, which represents a substantial

gap. Neglecting these factors severely hampers a comprehensive understanding of the cultural impacts associated with the proposed development.

Additional concerns arise regarding the rights of the community and their engagement in this process. The Gaelic-speaking population, embodying distinct cultural traits akin to those of Indigenous Peoples, has not been afforded the Free, Prior and Informed Consent process. This lack of genuine engagement undermines the credibility of the assessment and fails to adhere to established participatory principles in matters that impact cultural and environmental interests.

A critical procedural oversight is the absence of a compliant Island Communities Impact Assessment, a statutory requirement stipulated by the Islands (Scotland) Act 2018. This omission hinders the competent authority's ability to legally assess the social, cultural, and economic implications for the island community. The absence of this assessment alone precludes a lawful determination of the proposal.

From a policy standpoint, these shortcomings place the development proposal in clear opposition to the National Planning Framework 4, especially concerning the safeguarding of historic assets and places. The failure to evaluate both tangible and intangible heritage, as well as to acknowledge living cultural practices, represents a significant deviation from policy expectations.

When considered collectively, the inadequacies in assessing living heritage, intangible cultural value, community rights, and adherence to statutory duties create a substantial evidential gap. The cultural impacts of the development remain inadequately addressed, and the application fails to establish a solid foundation for assessing the genuine cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency surrounding the social impacts, health, and wellbeing associated with the proposed development raises serious concerns regarding the application's validity. A commissioned Social Impact Assessment involved local residents through focus groups; however, the full report has not been made available. This omission results in a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the social risks identified in the developer's own research.

Available summaries reveal that residents are currently facing tangible stress, anxiety, and concerns due to the scale and proximity of the proposal. These impacts are not speculative, as they stem from direct engagement with the community. Nevertheless, the failure to disclose the complete assessment restricts meaningful scrutiny of the findings, limiting the capacity to gauge their significance in the decision-making process.

Furthermore, the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this recognition,

these critical impacts have not been adequately incorporated into the main application, nor have they been given the necessary weight in deliberations. The withholding of the full Social Impact Assessment consequently obscures the true human and social costs that could arise from the development.

This lack of disclosure not only undermines the Environmental Impact Assessment process but also prevents a comprehensive understanding of the social, economic, and health implications of such a large-scale development, particularly regarding its effect on community character and functioning. The absence of the full dataset means the application fails to provide a complete evidential basis for balancing potential benefits against harm.

From a policy perspective, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments should foster positive health outcomes and avert harm, yet the available evidence points to existing adverse effects that remain inadequately disclosed. Without the complete assessment, compliance with this policy cannot be confirmed.

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

Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, results in an incomplete and unreliable assessment. This inadequacy hinders a lawful determination and underscores the conclusion that the application is unsupported by sufficient information.

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

The West Lewis coastline is home to clean coastal waters and important habitats that are sensitive to sediment disturbance and contamination. Although the application

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

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

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

Overall, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts result in a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

By postponing or omitting the evaluation of onshore impacts, the application obstructs a proper appraisal of cumulative effects. The Environmental Impact Assessment

process mandates that all aspects of a project be considered collectively, yet the segregation of offshore and onshore components obscures the total impacts on peatlands, habitats, and local communities.

There are serious risks posed to sensitive habitats, including machair systems and peatland environments that enjoy policy protection. The application fails to adequately demonstrate that the impacts on these habitats have been fully considered or that effective avoidance measures have been applied, leading to a significant evidential gap concerning biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is 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.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development according to statutory duties, national policy, and evidential standards. The application reiterates the main issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. It is now submitted under a more rigorous policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant gaps in the evidential basis for determining the application. It lacks complete baseline data, utilises an undefined design envelope, depends on unspecified mitigation measures, and overlooks important impact pathways such as nocturnal wildlife, full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of potential significant effects or residual impacts.

Moreover, procedural shortcomings are evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the omission of the full Social Impact Assessment represents a significant gap. These failures hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contradicts National Planning Framework 4, as it does not adequately demonstrate protection of biodiversity, natural areas, and cultural heritage. It fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been properly assessed, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in some areas. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been met, necessitating the application of the precautionary principle and preventing a lawful conclusion that the impacts are acceptable.

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

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

Therefore, a formal request is made for the application for the Spiorad na Mara Offshore Wind Farm to be entirely refused.

Additional Comments

Just Stop Wind.

We already have too much in Scotland. This is to enrich 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: 2828A9D6

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting materials reveals significant 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 proposal's scale, proximity to the shoreline, and design, all of which question its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. There is a critical absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Several key aspects of the proposal are undefined, and the flexible design framework used hinders a comprehensive understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a complete and informed overview of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack solid evidence.

The proposal faces clear and substantial policy conflicts. It appears to be inconsistent with 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. The application does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's capacity to deem the development acceptable from a policy standpoint.

Given the unprecedented scale of the proposal in this location, with large turbines situated close to the shoreline, there are significant 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 incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate and fails to deliver a comprehensive, transparent, and trustworthy evaluation of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, which lacks commitments to specific turbine sizes, layouts, or configurations, introduces considerable uncertainty and obstructs the consistent application of a worst-case scenario. This situation compromises the assessment's integrity, making it difficult for both the public and the competent authority to grasp the true extent of environmental impacts.

The application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. Consequently, consent is being requested with the expectation that environmental harm will be managed at a later stage. This approach hinders a meaningful evaluation of the measures' effectiveness and the assessment of residual impacts. Such deferral of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and the use of assumptions rather than site-specific evidence. These issues create uncertainty regarding the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not meet the evidential threshold set by 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, especially regarding biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that proper safeguards are in place.

In summary, the dependence on an undefined design envelope, the lack of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings hinder a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in the assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a structured and evidence-based comparison of realistic alternatives based on their environmental impacts, it provides a narrative that details

the project's evolution. This narrative approach does not adequately demonstrate that less harmful options have been effectively identified, assessed, and chosen over more damaging solutions.

Furthermore, there is a lack of transparent comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the assessment does not indicate that the developer has properly considered the option of placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis raises serious questions about whether the proposed siting truly represents the least damaging option available.

The inadequacies also extend to the evaluation of cable routing and landfall assessments, as there is insufficient evidence that alternative routes have been adequately explored to minimise impacts on sensitive receptors. This includes areas of significant cultural and spiritual value, such as Barvas Cemetery. The lack of a clear strategy for avoidance and the absence of comparative analysis suggest that mitigation by design has not been adequately considered, with an undue reliance on post-design mitigation measures instead.

As a consequence, the application does not establish 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 and prevents the competent authority from determining whether less harmful and more suitable alternatives are available. In the absence of a thorough alternatives assessment, it cannot be concluded that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, these deficiencies undermine adherence to National Planning Framework 4, particularly concerning the protection of natural environments, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant oversight that supports the conclusion that the application has not undergone sufficient evaluation and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species is significantly lacking, providing neither a complete nor a reliable understanding of ecological receptors within the West Lewis coastal environment. This area is highly sensitive and biologically active, yet the baseline data is inadequate, and the methodologies employed do not sufficiently capture species presence, behaviour, and habitat utilisation. Consequently, this assessment does not deliver a sound evidential basis for assessing potential impacts.

A notable shortcoming is the assessment of otters, a European Protected Species. The application fails to properly acknowledge and evaluate their active use of coastal zones for foraging and movement. The oversight of their core foraging range and behavioural

patterns results in a failure to adequately assess the potential effects of construction disturbances, noise, and increased activity. This oversight undermines any conclusions regarding the absence of significant effects on the species.

Further concerns are raised regarding the assessment of basking sharks. The reliance on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence. This is especially evident when compared to established land-based observations indicating frequent use of these waters. The omission of such critical data results in an incomplete baseline and further weakens the reliability of the conclusions drawn.

The methodological flaws highlighted mean that assertions of negligible or non-significant effects rely on assumptions rather than strong evidence. Additionally, the lack of adequate baseline data hampers meaningful assessments of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the actual level of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment conducted lacks reliability due to significant internal inconsistencies and methodological weaknesses, which result in a failure to provide adequate evidence. The application does not meet the evidential threshold required to demonstrate that the integrity of protected sites will remain unaffected. Notably, the assessment fails to robustly evaluate the implications of displacement, collision risk, or habitat loss within key foraging areas and migratory pathways located on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline.

There exists a fundamental contradiction in the application. The developer asserts that no significant adverse effects will occur while simultaneously proposing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and the validity of its conclusions, which are not substantiated by the evidence presented.

Furthermore, the assessment does not sufficiently account for the importance of feeding grounds associated with protected sites, such as the Lewis Peatlands and St Kilda. The reliance on modelling approaches creates uncertainty, particularly for species experiencing severe decline, including Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially where baseline data is lacking and behavioural responses remain inadequately understood.

The placement of turbines within a recognised migratory corridor introduces a notable risk, as it effectively creates a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor are not adequately addressed in the application, nor are the potential effects on species with relatively small global populations considered.

In light of these deficiencies, the application stands in direct conflict with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not face adverse effects undermines compliance with national policy.

Collectively, these factors contribute to the conclusion that the assessment does not fulfil the statutory requirements necessary to support a determination. The standard of beyond reasonable scientific doubt has not been achieved, thereby engaging the precautionary principle and precluding a lawful conclusion in favour of consent.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is markedly deficient, as it overlooks the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are deeply interwoven. The application reduces heritage to a collection of isolated, static assets, neglecting their ongoing social, cultural, and spiritual relevance within the community.

A significant shortcoming is evident in the handling of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are active locations for burial and spiritual practices; however, the assessment treats them merely as static features, failing to account for their continued usage and the implications of development on their surroundings. This misrepresentation leads to an incomplete analysis of cultural effects, disregarding their importance to community life.

Moreover, the application neglects to examine intangible cultural heritage, which includes the Gaelic language, local traditions, and the historical bond between the community and the coastal landscape. These aspects are crucial to the area's identity but are entirely omitted from the assessment, constituting a significant oversight. Without addressing these elements, the cultural ramifications of the development remain inadequately understood.

Concerns extend to community rights and involvement. The Gaelic-speaking

population embodies a unique cultural identity, recognised as having characteristics of Indigenous Peoples, yet no Free, Prior and Informed Consent process has been initiated. The lack of genuine engagement diminishes the credibility of the assessment and fails to adhere to established principles of participation in matters concerning cultural and environmental interests.

Another critical procedural lapse is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. In the absence of this assessment, the competent authority cannot meet its legal obligation to assess the social, cultural, and economic impacts on the island community. This oversight alone precludes 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 locations. The failure to recognise both tangible and intangible heritage, alongside the disregard for living cultural practices, constitutes a clear deviation from policy requirements.

In sum, the neglect to evaluate living heritage, intangible cultural significance, community rights, and statutory duties creates a substantial evidential gap. The cultural impacts of the development have not been adequately considered, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal presents significant challenges regarding the assessment of social impacts, health, and wellbeing, which are materially deficient and lack the necessary transparency for lawful evaluation. Although the developer commissioned a Social Impact Assessment that included focus groups with local residents, the full report has not been made available. This omission creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to grasp the complete range of social risks highlighted by the developer's own research.

Residents are already reporting measurable levels of stress, anxiety, and concern associated with the scale and proximity of the proposed development. These impacts stem from direct engagement and are not mere speculation. The failure to disclose the full assessment limits the capacity for thorough scrutiny of the findings and restricts the evaluation of their significance within the overall decision-making process.

Moreover, there is clear evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with “cultural loss” cited among the developer’s findings. However, these impacts have not been sufficiently integrated into the main application nor afforded the appropriate weight they deserve. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency adversely affects the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health ramifications is vital for developments of this magnitude, particularly when they may disrupt community character and function. By failing to provide the complete dataset, the application falls short of establishing a thorough evidential basis for weighing the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. The development is required to promote positive health outcomes and mitigate harm; however, the evidence at hand reveals existing adverse effects that have not been fully disclosed. Without the complete assessment, the application cannot claim compliance with this crucial policy.

The procedural implications of these omissions 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 material omission within the application and fails to meet the evidential requirements stipulated by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the full Social Impact Assessment, coupled with clear evidence of existing adverse impacts, results in an incomplete and unreliable evaluation. This undermines the ability to reach a lawful determination and supports the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposal is severely lacking and does not sufficiently capture the scale of change or the sensitivity of the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and significant remoteness. The introduction of large-scale turbines near the shoreline would create a continuous industrial presence that fundamentally alters this character, leading to a permanent and irreversible transformation of the landscape.

The application fails to adequately reflect the magnitude of visual change anticipated. Given their size and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations. Such an impact would directly affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not convey the extent of this impact or its significance within the context of such a sensitive landscape.

There are also significant methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints might not adequately represent the most sensitive receptors or worst-case scenarios, particularly in relation to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact has been understated, which undermines the reliability of the assessment.

Another critical shortcoming is the lack of an assessment of the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are situated within a broader landscape setting that is visually and spatially connected to the Atlantic horizon. The assessment treats these assets as isolated, failing to acknowledge their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal conflicts with National Planning Framework 4 concerning the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the obligation to protect landscape character, visual amenity, and the setting of culturally significant sites. The lack of a robust worst-case assessment further undermines any claims of compliance with policy.

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

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

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

A critical issue lies in the presumption that fishing activity can be displaced without repercussions. The application fails to present any evidence indicating that alternative fishing grounds are viable, accessible, or capable of handling the additional pressure resulting from such displacement. This lack of information is alarming, as it poses a risk of overfishing in other areas and could have broader economic ramifications for the local fishing fleet. Without a clear and well-supported assessment, it is impossible to fully grasp the impacts on fisheries and local livelihoods.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise generated during construction activities. The prolonged use of high-

energy hammer piling is likely to disturb marine life over considerable distances, adversely affecting species like dolphins. The anticipated disruption to a large portion of the local bottlenose dolphin population is concerning, yet the application minimises these effects without providing adequate supporting evidence.

There exists a troubling inconsistency within the application itself; while it acknowledges the necessity for licences to permit harm to European Protected Species, it simultaneously characterises these impacts as negligible. This contradiction diminishes the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly when harm is predicted to a level that requires legal authorisation.

Furthermore, the assessment neglects to consider the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without an all-encompassing evaluation of these interconnected effects, it remains impossible to ascertain the overall impact on marine ecosystems and the socio-economic landscape.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not provide evidence that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thus failing to establish that the proposal is an example of sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant deficiencies in its assessment of onshore infrastructure, which is critical to understanding the complete impact of what is essentially a single integrated project. The offshore turbines and the associated onshore works are interconnected, yet they are evaluated separately. This fragmented approach obscures the true scale of the environmental and socio-economic effects involved.

Onshore works encompass 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 involve excavation in areas of deep peat, notably within Barvas Moor, which is not only a vital carbon store but also an ecologically delicate habitat. The assessment fails to provide a thorough evaluation of these impacts, hampering a complete understanding of the project's overall environmental footprint.

Moreover, the omission or postponement of the assessment concerning onshore

impacts hinders the ability to evaluate cumulative effects properly. The Environmental Impact Assessment process is designed to consider all components of a project collectively; however, the disparate treatment of offshore and onshore elements 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 are under policy protection. The application does not show that it has fully assessed the impacts on these habitats or that suitable avoidance measures have been put in place, resulting in a significant evidential gap concerning biodiversity protection.

Concerns also arise regarding the carbon balance as the disturbance of peatland can release stored carbon, potentially leading to a carbon debt that contradicts renewable energy development goals. This issue has not been adequately addressed in the application, nor is there sufficient demonstration that the overall carbon balance remains advantageous.

Furthermore, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, calling into question the deliverability and lawful implementation of the project.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment contains a significant gap, as it fails to address the crucial aspects of dark skies and nocturnal wildlife. The West Lewis coastline, known for its exceptionally dark skies, is vital for environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that would create a persistent and disruptive “wall of light” across the western horizon, fundamentally altering the night-time environment.

The application neglects to evaluate how this lighting impacts visual amenity, landscape character, or the experiences of both residents and visitors. This oversight is particularly concerning given the role of dark skies in the area's identity and the potential growth of sectors such as astro-tourism. This failure to assess such impacts results in a clear deficiency in the overall landscape and environmental evaluation.

Moreover, there is a lack of consideration for the effects on nocturnal wildlife. Certain species, including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, are notably sensitive to artificial lighting, which can lead to disorientation and a heightened risk of collisions. The absence of any lighting impact assessment or a study on phototaxis means there is no evaluation of how aviation lighting might affect these species or increase mortality rates.

The reliance on daytime survey data in the ornithological assessment further compounds this issue, as it does not adequately capture nocturnal activities or associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are equally at risk of disorientation from artificial lighting, yet this has not been assessed. Without site-specific night-time data, the understanding of ecological impacts remains critically deficient.

Assessing nocturnal impacts is essential for determining whether protected species or designated sites might be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thereby invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, the absence of this assessment contradicts the National Planning Framework 4's directives regarding the protection of natural places and environmental quality. Furthermore, it diminishes the overall evaluation of landscape and seascape impacts, as the character of night-time is a fundamental aspect of the environment.

In summary, the lack of any evaluation concerning dark skies and nocturnal wildlife represents a significant evidential gap. The deficiencies in baseline data, impact modelling, and species-specific analysis render the application incomplete and incapable of substantiating a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. This application echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. The current proposal is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Significant gaps in baseline data and the continued use of an undefined design envelope raise concerns regarding the evidential foundation for this application. The reliance on unspecified mitigation measures and the omission of critical impact pathways, such as nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, contribute to an Environmental Impact Assessment that is incomplete. This lack of thorough analysis impedes a full understanding of the likely significant

effects or residual impacts.

Moreover, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment is a material omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal is inconsistent with the National Planning Framework 4, as it does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. It also fails to show that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Furthermore, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, clouding the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks are uncertain and could be significant. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and occasionally inconsistent. The evidential threshold needed to eliminate adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

Additionally, the proposal would cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual connections, and impacts on tourism would result in permanent effects that cannot be mitigated to a satisfactory level.

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, combined with conflicts with policy and unresolved environmental risks, hinder the ability to make a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or activate the relevant regulatory measures to require the submission of the missing information.

Therefore, a formal request is made for the rejection 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: 1272951E

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a careful examination of the Environmental Impact Assessment Report and its supporting documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposed development's scale, design, and proximity to the shoreline raise serious concerns regarding its alignment with statutory requirements, national policies, and the principles of sustainable development.

The application does not provide a sufficient evidential basis for a lawful decision. There is a notable absence of critical environmental data, with baseline information that is both limited and inconsistent. Key components of the proposal remain undefined, which undermines the ability to assess likely significant effects. Additionally, the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to offer a comprehensive understanding of the potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident throughout the proposal. It appears to contradict the National Marine Plan, the Environmental Impact Assessment framework, and National Planning Framework 4, especially concerning biodiversity, natural habitats, cultural heritage, and health and wellbeing. The application does not convincingly demonstrate that it can meet national obligations to safeguard biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for obtaining consent and compromise the ability of the competent authority to determine the development's acceptability from a policy perspective.

Furthermore, the unprecedented scale of the proposal, with large turbines located near the shoreline, raises significant issues related to landscape capacity, visual impact, and overall environmental consequences. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential weaknesses, and clear non-compliance with established policies, it is evident that the application is incomplete and cannot support a lawful determination. In these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate, failing to deliver a thorough, transparent, and dependable account of the environmental consequences of the proposed project. A flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity hinders the ability to apply a worst-case scenario consistently, ultimately compromising the integrity of the assessment. As a result, the presented impacts may not accurately reflect the final development, thereby obstructing both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Significant reliance on yet-to-be-defined mitigation measures, monitoring strategies, and management plans is evident in the application. Seeking consent on the premise that environmental harm will be mitigated at a future date precludes any meaningful evaluation of effectiveness or residual impacts. This postponement of critical information to post-consent phases is procedurally unacceptable, conflicting with the aims of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation are clearly defined prior to determination.

Evidential deficiencies are also present, with noticeable gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This situation creates uncertainty about the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without solid supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot align with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The application does not adequately assess alternatives 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 application presents a fundamentally flawed assessment of marine ecology and protected species, significantly undermining the reliability of its conclusions. In particular, the methodologies used are inadequate for capturing the presence, behaviour, and habitat use of ecological receptors within the West Lewis coastal environment, a region recognised for its biological activity and sensitivity. The data collected thus far is incomplete, failing to provide a comprehensive understanding necessary for evaluating potential impacts.

The assessment notably neglects to appropriately identify and assess the active use of coastal areas by otters, which are classified as a European Protected Species. This oversight means that their core foraging range and behavioural patterns have not been taken into account, leading to an incomplete evaluation of the potential effects arising from construction disturbance, noise, and increased activity. Consequently, the conclusions drawn regarding the absence of significant effects on otters lack a robust evidential basis.

Further weaknesses are evident in the evaluation of basking sharks, where the reliance on aerial surveys introduces a significant detection bias. This method is particularly ineffective under Atlantic conditions, likely leading to an underestimation of the species' presence in the area. Established land-based observations indicate that these waters are frequently used by basking sharks, yet such data has not been adequately considered, resulting in an incomplete baseline for the assessment.

The shortcomings in methodology raise concerns about the validity of the conclusions indicating negligible or non-significant effects, as they are primarily based on assumptions rather than solid evidence. Additionally, the lack of sufficient baseline data hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and interactions within the wider ecosystem. This situation creates substantial uncertainty regarding the true risks posed to marine species and habitats.

Regulatory requirements are also not met, as the application fails to properly identify or assess protected species in accordance with the Environmental Impact Assessment regime and National Planning Framework 4. This level of uncertainty prevents the exclusion of adverse effects beyond reasonable scientific doubt, which should invoke the precautionary principle, thereby rendering the granting of consent unlawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions culminates in an unreliable assessment. These issues hinder a thorough evaluation of impacts on marine ecology and protected species, confirming that the application does not possess a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant gaps and inconsistencies that undermine its conclusions. The application does not sufficiently demonstrate that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected by the proposed development. This area is crucial for foraging and migratory routes, yet the assessment fails to adequately evaluate risks associated with displacement, collision, or habitat loss.

Moreover, the application contains a fundamental contradiction. The developer claims that there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation, which is only necessary if significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not backed by adequate evidence.

The assessment lacks enough proof that seabirds associated with protected areas, such as the Lewis Peatlands and St Kilda, will be unaffected. The importance of these feeding grounds is not fully addressed, and the reliance on modelling methods adds uncertainty, especially for declining species like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly when baseline data is missing and behavioural responses are not well understood.

Furthermore, placing turbines within a recognised migratory corridor poses a significant risk by obstructing a primary flight path used by species travelling between the United Kingdom and Iceland. The application does not properly assess the long-term impacts of sustained mortality in this corridor or the potential effects on species with small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold necessary to determine no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and modelling limitations, means the standard of beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion that would support consent.

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

Overall, the assessment is deemed unreliable due to internal inconsistencies, methodological flaws, and insufficient evidence. These weaknesses hinder a thorough evaluation of potential impacts and lead to the conclusion that the application does not meet the statutory requirements needed for a valid determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity is severely lacking, failing to acknowledge the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interwoven. Rather than recognising heritage as a living, dynamic element, the application simplifies it into isolated, static assets. This flawed perspective neglects the ongoing social, cultural, and spiritual significance of these elements within the community.

Particularly alarming is the inadequate treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites are not merely historical markers; they are active locations for burial and spiritual practices. The assessment reduces them to static features, ignoring their continued use and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and dismisses their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity, yet they are entirely absent from the evaluation, representing a significant gap. Without addressing these factors, the true cultural impact of the development remains obscured.

There are also substantial concerns regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity, with recognised characteristics of Indigenous Peoples, yet the application does not include a process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and contravenes established principles that call for participation in decisions affecting cultural and environmental matters.

A major procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This deficiency alone obstructs a lawful determination.

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

Taken as a whole, the failure to assess living heritage, intangible cultural value, community rights, and statutory duties creates a significant evidential gap. The cultural impacts of the proposed development have not been adequately examined, and the application does not provide a sufficient foundation for understanding the true cultural cost of the project.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development raises serious concerns regarding the assessment of social impacts, health, and wellbeing, which is significantly inadequate and lacks the necessary transparency for a lawful evaluation. Although the developer has commissioned a Social Impact Assessment that involved focus groups with local residents, the full report remains unpublished. This creates a substantial evidential gap that hinders both the public and the competent authority from comprehending the extent of social risks revealed by the developer's own research.

Available summaries suggest that residents are already suffering from measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These effects arise from direct engagement and are not speculative in nature. However, without disclosing the complete assessment, there is an inability to scrutinise the findings adequately, which limits the capacity to gauge their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with the term “cultural loss” noted within the developer’s own findings. Despite this recognition, these impacts have not been fully integrated into the main application nor given the appropriate weight they deserve. The omission of the complete Social Impact Assessment obscures the genuine human and

social costs associated with the development.

This lack of transparency severely undermines the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly where community character and functioning may be at stake. The absence of the complete dataset means that the application does not provide a solid evidential foundation for assessing the balance between potential benefits and harms.

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 avoid harm, yet the evidence currently available points to existing adverse effects that remain undisclosed. Without access to the full assessment, compliance with this policy cannot be established.

The procedural ramifications are considerable. The competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material shortcoming within 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 existing adverse impacts, leaves the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application lacks sufficient supporting information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual impacts and the seascape and landscape effects of the proposed development is fundamentally flawed and does not adequately account for the extent of change or the vulnerability of the environment it will affect. The coastline of West Lewis is characterised by an unspoilt Atlantic horizon, a natural setting, and a pronounced sense of seclusion. The introduction of large turbines in close proximity to the coast would create a persistent and overwhelming industrial presence, which would fundamentally change this character and lead to a permanent and irreversible alteration of the landscape.

The application does not sufficiently capture the extent of the visual change that would occur. Due to their scale and proximity, the turbines would dominate views from residential areas, historic locations, and popular coastal spots, directly impacting visual amenity and undermining the qualities that define the area's naturalness and seclusion. The assessment fails to adequately represent the significance of this impact within the context of such a sensitive landscape.

Methodological issues arise concerning the choice and depiction of visual viewpoints. Evidence indicates that the selected viewpoints may not accurately represent the most sensitive receptors or the worst-case scenarios, especially regarding significant

cultural heritage sites and valuable landscapes. This oversight risks underestimating the visual impacts, compromising the assessment's reliability.

Furthermore, the assessment neglects to evaluate the interconnectedness between the landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to their wider landscape setting, connected visually and spatially to the Atlantic horizon. By treating these assets as standalone entities, the assessment fails to acknowledge their interdependence, resulting in an incomplete assessment of impacts on their cultural significance and setting.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This situation represents not just a visual issue but a broader cultural and spatial detriment that has not been adequately examined in the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of natural environments and historical assets. The magnitude of the anticipated changes is incompatible with the need to protect landscape character, visual amenity, and the contexts of culturally significant sites. Additionally, the lack of a comprehensive worst-case assessment further weakens any argument for policy compliance.

It is evident that the impacts noted cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their visual presence would be dominant and unavoidable. The changes wrought would be fundamental and permanent, rather than amenable to reduction through mitigation efforts.

In summary, the assessment fails to accurately depict the scale of the impacts, the sensitivity of the receiving environment, and the interconnectedness of the landscape and heritage. These shortcomings result in an unreliable evaluation and reinforce the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to its incomplete assessment of construction and pollution risks, which lacks the necessary detail to understand the potential environmental impacts. It involves extensive seabed preparation and installation activities within a challenging Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application suggests relying on mitigation and contingency measures that are to be formulated after consent, which makes it impossible to evaluate their sufficiency or effectiveness.

This approach is particularly alarming considering the vulnerability 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 does acknowledge certain risks, including sediment mobilisation and possible chemical or oil spills, it fails to outline adequate strategies to prevent, control, or monitor these issues.

There is further ambiguity 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 gauge the extent, duration, or ecological implications of these impacts. This uncertainty extends to the potential effects on already sensitive marine species and habitats highlighted in the broader assessment.

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing the planning for contingencies until after consent is granted, the application compromises the ability to evaluate whether proper safeguards are established to handle pollution incidents. This introduces procedural risks and weakens the capacity of the competent authority to make informed decisions regarding environmental protection measures at the point of determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the requirements set out by the Environmental Impact Assessment framework. Significant effects and mitigation strategies must be appraised before consent can be granted, and the absence of this information means a lawful determination cannot be achieved. Additionally, the application does not demonstrate adherence to policy standards concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts significantly undermines the assessment's validity. These deficiencies prevent a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The application does not adequately evaluate the impacts on fisheries and marine life, presenting significant risks to both the ecosystem and the local fishing industry. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing sector, yet the proposal fails to establish how these vital resources can be preserved amidst development activities without causing major disruptions.

One critical concern is the assumption that fishing activities can be relocated without any negative effects. The application lacks supporting evidence that alternative fishing grounds exist, are accessible, or can sustain the additional pressures of displaced fishing efforts. This gap in information is crucial, as it raises the possibility of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and community livelihoods remain poorly understood due to this lack of a clear and evidence-based assessment.

Furthermore, the proposed development poses notable risks to marine species,

especially due to the underwater noise generated during construction activities. High-energy hammer piling is anticipated to cause disturbances across extensive distances, which could adversely affect local species, including dolphins. The potential disturbance to a significant portion of the local bottlenose dolphin population is alarming, yet the application minimises these effects without adequate evidence to support such claims.

There is also a troubling inconsistency within the application regarding the necessity of licenses for actions that may harm European Protected Species. While the potential for such harm is acknowledged, impacts are simultaneously characterised as negligible. This contradiction undermines the assessment's credibility and raises serious concerns about adherence to the Habitats Regulations, particularly when harm is expected to a degree that necessitates legal authorisation.

Additionally, the assessment neglects to account for cumulative impacts that arise from multiple sources of pressure, such as habitat disruption, noise, and the displacement of fishing activity. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application for the proposed project, which includes offshore turbines and onshore works, presents significant deficiencies in its assessment of onshore infrastructure. The onshore elements consist of cabling across protected moorland, the construction of a substation near Stornoway, and associated access infrastructure that traverses sensitive landscapes. These works involve excavation in deep peat areas, particularly within Barvas Moor, a critical carbon store and ecologically sensitive habitat. The incomplete assessment of these impacts leads to an insufficient understanding of the project's overall environmental footprint.

A fundamental issue is the separation of offshore and onshore components, which results in a fragmented evaluation that fails to consider the cumulative effects of the entire project. The Environmental Impact Assessment process necessitates that all parts of a project are assessed collectively. By neglecting to evaluate the combined impacts on peatlands, habitats, and local communities, the application precludes a

thorough understanding of the associated risks and challenges.

Additionally, the potential impacts on sensitive habitats, including machair systems and peatland environments, are not adequately addressed. The application does not provide sufficient evidence that these habitats have been fully assessed or that appropriate measures to avoid detrimental effects have been implemented, leaving a notable gap in the evidence concerning biodiversity protection. Furthermore, the proposed routing of infrastructure through active croft land raises concerns about conflicts with existing land use and legal rights, as there is no indication that the necessary consents or processes have been initiated.

From a policy standpoint, the fragmented assessment of the project undermines compliance with the National Marine Plan and National Planning Framework 4. The failure to demonstrate the protection of peatlands, habitats, and land use interests, coupled with the inability to show that impacts can be avoided or mitigated, further jeopardises the application. Collectively, these issues render the application incomplete and unreliable, preventing a lawful determination of the project's viability.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of an assessment of dark skies and nocturnal wildlife is a significant gap within the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are crucial for environmental quality, cultural identity, and tourism. The introduction of permanent red aviation lighting, which would be visible over long distances, is likely to create a persistent and disruptive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the role that dark skies play in the area's identity and the growth of sectors like astro-tourism. The lack of consideration for these impacts creates a clear deficiency in the overall assessment of the landscape and environmental factors.

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

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

involved.

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

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

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This proposal mirrors the core issues of the 2008 Lewis Wind Power application, where the level of industrialisation was deemed unacceptable. Notably, it is now being advanced under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical examination reveals that the application does not present a comprehensive or reliable evidential basis for evaluation. There are significant gaps in baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures further complicates the assessment. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As such, the Environmental Impact Assessment is incomplete, failing to provide clarity on likely significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

Moreover, the proposal contravenes National Planning Framework 4. It does not adequately safeguard biodiversity, natural places, and cultural heritage. The evidence provided does not support that health and wellbeing impacts are acceptable, nor does it demonstrate 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 potential impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion on the acceptability of impacts.

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

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

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

Additional Comments

I strongly oppose this plan as it will ruin the landscape and the beautiful views that surround our islands. They do not even benefit islanders as the electricity produced at these proposed sites will head straight down south. Awful idea and hopefully does 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: 4ED1D709

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

Dear Sir/Madam

This letter represents a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant deficiencies related to planning, environmental, cultural, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and a strong cultural identity. The proposal raises serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Key components of the proposal remain unclear, and the flexible design framework employed hinders a proper assessment of likely significant effects. Furthermore, the reliance on unspecified mitigation measures calls into question their effectiveness, rendering the documentation inadequate for a comprehensive understanding of the potential environmental, cultural, or community impacts. Consequently, assertions of negligible or non-significant effects lack robust supporting evidence.

Policy conflicts are evident and substantial. The proposal appears at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts directly undermine the statutory tests essential for obtaining consent and impair the competent authority's ability to determine whether the development is policy-compliant.

The scale of the proposal is unprecedented for this location, as it includes large turbines positioned very close to the shoreline, which raises serious concerns regarding landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance, it is evident that the application is incomplete and cannot support a lawful determination. Under these conditions, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is fundamentally flawed due to its reliance on an undefined design envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This creates considerable uncertainty and undermines the assessment's integrity, making it impossible to accurately evaluate worst-case scenarios. As a result, the impacts presented may not truly represent the development that is ultimately constructed, leaving both the public and the competent authority without a clear understanding of the environmental effects.

Moreover, the Environmental Impact Assessment Report is materially deficient, failing to provide a full and reliable account of the likely environmental impacts of the proposal. It depends heavily on undefined mitigation measures, monitoring strategies, and management plans, which have yet to be articulated. By seeking consent based on the premise that environmental harm will be addressed later, the application effectively precludes any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This deferral of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to any determination.

Furthermore, there are notable evidential deficiencies present, including significant gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. These shortcomings contribute to uncertainty regarding the scale and significance of impacts, especially when negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hinders the ability to clearly understand cumulative and worst-case impacts, thereby introducing scientific uncertainties that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations, which requires exclusion of adverse effects beyond reasonable scientific doubt. This triggers the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly with respect to biodiversity protection and environmental integrity, as it does not adequately show that impacts have been fully assessed or that appropriate safeguards are in place.

Overall, the combination of an undefined design envelope, unspecified mitigation measures, and insufficient baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The proposed application fails to demonstrate a proper assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of realistic alternatives based on their

environmental impacts, the application presents a narrative that outlines the project's evolution. This methodology does not establish that less harmful options have been adequately identified, assessed, and chosen over more damaging alternatives.

Moreover, there is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Specifically, the application does not prove that the developer has seriously explored the option of positioning turbines further offshore, where potential visual, ecological, and coastal impacts could be mitigated. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in assessing impact further highlight the need for such analysis. The failure to include this evaluation undermines any conclusion regarding whether the proposed siting constitutes the least damaging choice.

The shortcomings also extend to the evaluation of cable routing and landfall options, with insufficient evidence provided to show that alternative routes have been thoroughly examined to avert or lessen impacts on sensitive receptors. This encompasses locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear avoidance strategy and a comparative analysis signifies that mitigation by design has not been employed, with the focus instead being on post-design mitigation measures.

Consequently, the application does not prove that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This omission constitutes a failure to adhere to the established mitigation hierarchy, preventing the competent authority from determining whether there are less harmful and more suitable alternatives available. The lack of a comprehensive assessment of alternatives raises concerns regarding the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, particularly with respect to the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone sufficient evaluation to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is fundamentally deficient, failing to deliver a comprehensive or dependable understanding of ecological receptors in the West Lewis coastal environment. This marine system is recognised for its biological sensitivity and activity; however, the incomplete baseline data and inadequate methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, the assessment lacks a solid 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 acknowledge or assess their active utilisation of coastal areas for foraging and movement. This lack of consideration for their core foraging range and behavioural patterns means that potential impacts from construction disturbance, noise, and increased activity have not been sufficiently evaluated. As a result, any conclusions drawn about the absence of significant effects on otters are fundamentally undermined.

Additionally, there are notable deficiencies in the assessment of basking sharks, which are exacerbated by reliance on aerial surveys that introduce significant detection bias, particularly under Atlantic conditions. This method is likely to underreport the species' presence, especially when compared to established land-based observations that demonstrate frequent use of these waters. The failure to properly incorporate or consider such data contributes to an incomplete baseline, further weakening the reliability of the conclusions drawn.

The limitations of the methodologies employed result in conclusions regarding negligible or non-significant effects being derived from assumptions rather than robust evidence. Moreover, the absence of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This lack of clarity raises concerns about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4. The proper identification and assessment of protected species have not been conducted, creating a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby engaging the precautionary principle. Under these circumstances, lawful consent cannot be granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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 submitted as part of the application is materially flawed, containing significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application does not adequately demonstrate that these species will not be adversely affected, particularly given that the development is located within key foraging areas and migratory pathways. The implications of displacement, collision risk, or habitat loss are not robustly evaluated, raising concerns regarding the potential impact on these populations.

A critical contradiction within the application arises from the developer's conclusion of no significant adverse effects, juxtaposed with the advancement of a Habitats Regulations derogation case, which is necessitated only where significant harm is anticipated. This inconsistency undermines the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. Furthermore, the assessment fails to convincingly address the impact on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The assessment does not fully account for the importance of these feeding grounds, and its reliance on modelling approaches introduces uncertainty, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially where baseline data is lacking and behavioural responses are not thoroughly understood.

The placement of turbines within a recognised migratory corridor significantly increases risk, effectively obstructing a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application lacks a sufficient assessment of the long-term implications of sustained mortality within this corridor, as well as the potential effects on species with relatively small global populations. From a regulatory standpoint, the application does not meet the evidential threshold necessary to ascertain 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 achieved. Consequently, this engages the precautionary principle, preventing a lawful conclusion that would support consent.

These deficiencies also signify non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy. Collectively, the assessment's internal inconsistencies, methodological weaknesses, and insufficient evidence render it unreliable, hindering a comprehensive evaluation of impacts and leading to the conclusion that the application does not satisfy the statutory requirements essential for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity in the application is fundamentally flawed. It fails to recognise the West Lewis coastline as a vibrant cultural landscape, where environment, language, tradition, and community are intricately linked. Instead, the assessment takes a narrow approach, treating heritage merely as a collection of isolated, static assets, rather than acknowledging their ongoing social, cultural, and spiritual significance to the community.

One significant shortcoming is the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These are active sites of burial and spiritual practice, yet the assessment categorises them as unchanging features, neglecting their ongoing use, significance, and how development could affect their surroundings. This

mischaracterisation leads to an incomplete understanding of cultural impacts and overlooks the cemeteries' roles within community life.

Moreover, the assessment neglects intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and the coastal environment. These aspects are central to the region's identity and are conspicuously absent from the assessment, which is a considerable oversight. The cultural impact of the development remains inadequately understood without these considerations.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population has a unique cultural identity, akin to that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the legitimacy of the assessment and fails to adhere to recognised principles of participation in decisions that impact cultural and environmental interests.

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

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. The failure to recognise both tangible and intangible heritage, alongside living cultural practices, clearly deviates from policy requirements.

Overall, the neglect of living heritage, intangible cultural value, community rights, and legal obligations culminates in a substantial evidential gap. The cultural impacts of the development have not been adequately assessed, and the application lacks a solid foundation for determining the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment, which included focus groups with local residents, yet the full report has not been published. This significant evidential gap hinders both public understanding and the ability of the competent authority to grasp the full extent of social risks identified through the developer's research. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative in nature. However, the failure to disclose the complete assessment limits proper scrutiny of the findings and obscures their significance in the decision-making process.

Furthermore, there is evidence suggesting that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" noted in the developer's own

findings. Unfortunately, these impacts have not been fully incorporated into the main application or given the appropriate consideration. The withholding of the full Social Impact Assessment obscures the true human and social cost associated with the development.

This lack of transparency has serious implications for the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. By failing to provide the complete dataset, the application does not 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. Development must facilitate positive health outcomes and mitigate harm. The available evidence suggests existing adverse effects that have not been fully revealed, thus preventing the demonstration of compliance with this policy in the absence of the full assessment.

The procedural implications are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the full Social Impact Assessment. This represents a material omission within the application and a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness, aspects that are integral to its undeveloped nature. The introduction of large-scale turbines near the shoreline threatens to impose a continuous industrial presence, which would fundamentally alter this unique character. This change would result in a permanent and irreversible transformation of the landscape, overshadowing the natural beauty that defines the area.

Concerns regarding the assessment of visual impacts are significant. The application fails to accurately represent the magnitude of change that would occur. The sheer scale and close proximity of the turbines mean that they would dominate views from residential areas and historic sites, as well as from popular coastal locations. Such dominance would erode the visual amenity and diminish the defining qualities of naturalness and remoteness within this sensitive landscape, yet this level of impact is not adequately conveyed in the assessment.

Methodological issues also arise concerning the selection and presentation of visual

viewpoints. Evidence indicates that these viewpoints do not sufficiently capture the most sensitive receptors or worst-case scenarios, particularly related to key cultural heritage sites and high-value landscapes. This raises concerns that the visual impact may have been understated, which undermines the credibility of the assessment.

Moreover, there is a failure to evaluate the interconnected relationships between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are interlinked with the wider landscape, sharing visual and spatial connections to the Atlantic horizon. However, the assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete understanding of how the proposal would impact their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are experienced and severing their ties to the natural horizon. This is not merely a visual issue; it represents a broader cultural and spatial harm that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural places and historic assets. The scale of proposed changes contradicts the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a robust worst-case assessment further weakens any argument for policy compliance.

It is clear that the identified impacts cannot be effectively mitigated. The dominance of the turbines due to their scale, height, and proximity means that their presence would be unavoidable. Consequently, the change would be fundamental and permanent, not something that could be reduced to an acceptable level through mitigation measures.

In conclusion, the assessment is inadequate in representing the extent of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal lacks sufficient detail concerning construction and pollution risks, rendering the assessment materially deficient. It involves significant seabed preparation and installation works within a high-energy Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would be devised post-consent. This reliance on undefined future measures raises serious concerns, particularly given the sensitivity of the receiving environment, which includes the West Lewis coastline that is home to clean coastal waters and important habitats vulnerable to sediment disturbance and contamination.

While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately detail the strategies for preventing, controlling, or monitoring these risks. Moreover, there exists uncertainty regarding the scale and behaviour of sediment plumes that may arise from seabed disturbance and cable installation. The absence of robust modelling and clearly defined management strategies leaves unanswered questions about the extent, duration, and ecological impacts of these disturbances. This uncertainty also extends to potential effects on marine species and habitats, which have already been identified as sensitive within the broader assessment.

Furthermore, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application inhibits the assessment of whether suitable safeguards are established to address pollution events. This creates procedural risks and undermines the competent authority's ability to evaluate environmental protection measures at the time of determination.

From a regulatory standpoint, the postponement of critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed prior to granting consent, and the absence of this information prevents a lawful determination. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, these deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry. However, the application does not provide a thorough evaluation of the ecological or socio-economic impacts, failing to demonstrate that these important habitats and activities can be protected without significant disruption.

A major concern is the assumption that fishing activity can be displaced without consequences. There is no evidence presented that alternative fishing grounds are available or able to handle increased pressure. This lack of information is critical, as displacement could lead to overfishing in other areas and potentially have wider economic repercussions for the local fishing fleet. Without a clear, evidence-based assessment, the effects on fisheries and livelihoods remain unclear.

The proposal also poses considerable risks to marine species, particularly due to underwater noise from construction activities. The extended use of high-energy hammer piling is likely to disturb marine life over large distances, affecting species such as dolphins. The application downplays the predicted impact on a significant portion of the local bottlenose dolphin population, raising serious concerns without adequate supporting evidence.

Furthermore, there is an inconsistency in the application regarding the need for

licences to harm European Protected Species, while simultaneously claiming that impacts are negligible. This contradiction undermines the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where harm is expected to occur at a level that requires legal authorisation.

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The current application regarding the project presents a significantly incomplete assessment of the onshore infrastructure, failing to fully address the impacts associated with what should be considered as a single integrated project. The offshore turbines and the corresponding onshore works are inherently interconnected; however, their separate evaluations lead to a disjointed analysis that obscures the actual extent of environmental and socio-economic consequences.

Among the onshore components, the proposed installation of cabling through protected moorland, the construction of a substation in proximity to Stornoway, and the establishment of access routes through delicate landscapes are notable. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, which is an ecologically sensitive habitat and a crucial carbon store. The application fails to deliver a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

Moreover, the omission or delay in assessing onshore impacts obstructs a comprehensive evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all aspects of a project must be examined collectively; yet, the delineation between offshore and onshore components results in an inadequate understanding of the combined effects on peatlands, habitats, and local communities.

There are considerable risks to sensitive habitats, such as machair systems and peatland environments, which have policy protection in place. The application does not

provide sufficient evidence that these habitats' impacts have been thoroughly evaluated or that suitable avoidance strategies have been implemented, leading to an evident gap in biodiversity protection.

Furthermore, the routing of the proposed infrastructure through active croft land poses possible conflicts with existing land use and legal rights. The application does not demonstrate that the requisite consents or processes have been commenced, casting doubt on the project's feasibility and lawful execution.

From a policy standpoint, the disjunction in assessing the project holistically and demonstrating the safeguarding of peatlands, habitats, and land use interests stands in contradiction to both the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be effectively avoided or mitigated further weakens the application.

In conclusion, the separation of project components, the lack of a comprehensive assessment, and the absence of substantial evidence concerning environmental and land use impacts culminate in an incomplete and unreliable submission, thus obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which play a crucial role in defining environmental quality, cultural identity, and tourism potential. The absence of an assessment regarding dark skies and nocturnal wildlife in the Environmental Impact Assessment represents a significant gap. The proposal introduces permanent red aviation lighting that will be visible over long distances, resulting in a persistent and disruptive “wall of light” effect across the western horizon. This change would fundamentally alter the night-time landscape.

Moreover, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. The significance of dark skies in relation to the area's identity and the emerging sector of astro-tourism cannot be overstated. Without proper assessment, this omission leaves a crucial void in understanding the landscape and environmental implications.

The lack of evaluation extends to the impacts on nocturnal wildlife, with no assessment of how artificial lighting may affect species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, all of which are susceptible to phototaxis, potentially leading to disorientation and a heightened risk of collisions. The application does not include any lighting impact assessment or phototaxis study, resulting in a failure to consider the effects of aviation lighting on these species and their potential mortality.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which neglects to capture nocturnal activities and associated 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 creates a critical gap in understanding ecological impacts.

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

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

In summary, the absence of any assessment related to dark skies and nocturnal wildlife constitutes a significant evidential gap. The lack of baseline data, impact modelling, and species-specific analysis means the application is incomplete and cannot support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the principles of sustainable development, particularly when assessed against statutory duties, national policy, and evidential standards. It echoes the primary concerns that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. Now, however, it is presented against a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis of the application. Critical gaps exist in baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures raises concerns. Furthermore, important impact pathways have been overlooked, including those affecting nocturnal wildlife, the full onshore infrastructure, and tourism implications. The Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment is a significant omission. These issues impede the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal conflicts directly with National Planning Framework 4. It fails to adequately protect biodiversity, natural places, and cultural heritage, does not demonstrate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative

effects of both offshore and onshore components have not been thoroughly assessed, leaving concerns about impacts on peatlands, carbon balance, habitats, and crofting land unaddressed.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals, along with instances of internal inconsistency, contribute to the failure to meet the evidential threshold needed to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, preventing a lawful determination that the impacts are acceptable.

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

When considered collectively, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct the possibility of a lawful, evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke relevant regulatory provisions to require the submission of the necessary information.

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

Additional Comments

Destruction of quality of life would only lead to people leaving the Island. And I fear this would be what the Bigger Plan desires.

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: 1959EDFE

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 review of the Environmental Impact Assessment Report and its supporting documentation reveals several material deficiencies related to planning, environmental considerations, cultural aspects, 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, near-pristine environment, and strong cultural identity. The scale and design of this proposal, along with its proximity to the shore, raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

There is a notable lack of critical environmental data within the application, with baseline information being both limited and inconsistent. Key components of the proposal remain undefined, and the flexible design framework obstructs a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures undermines the ability to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence.

The application exhibits clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural habitats, cultural heritage, and health and wellbeing. The proposal does not demonstrate compliance with national requirements for the protection of biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests necessary for consent and impair the competent authority's capacity to determine the development's acceptability in policy terms.

The unprecedented scale of this proposal, with large turbines positioned dangerously close to the shoreline, raises profound concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information provided, the reliance on undefined mitigation measures, evidential weaknesses, and apparent policy non-compliance, it is clear that the application is incomplete and incapable of facilitating a lawful determination. Under these circumstances, it is imperative that the precautionary principle be applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fundamentally flawed and fails to provide a thorough and trustworthy understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the existing baseline data is incomplete. The methodologies employed do not sufficiently capture the presence, behaviour, and habitat use of various species. Consequently, the evaluation lacks a solid evidential foundation to determine potential impacts.

A significant oversight pertains to otters, which are classified as a European Protected Species. The application does not adequately acknowledge or assess their active use of coastal regions for foraging and movement. By failing to consider their core foraging range and behavioural patterns, the assessment inadequately addresses the possible impacts of construction-related disturbance, noise, and increased activity. This oversight undermines any conclusions drawn about the absence of significant effects on this species.

Moreover, the assessment of basking sharks suffers from deficiencies, notably due to reliance on aerial surveys that introduce substantial detection bias, particularly under Atlantic conditions. This methodology is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly incorporate or consider such data leads to an incomplete baseline, thereby weakening the reliability of the conclusions.

The methodological shortcomings mean that conclusions suggesting negligible or non-significant effects are based on assumptions rather than sound evidence. Insufficient baseline data hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the actual risks posed 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 accurately identified or assessed protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these issues, granting consent cannot be legally justified.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These shortcomings obstruct a robust evaluation of the impacts on marine ecology and protected species, leading to the overarching conclusion that the application does not have a sufficient evidential basis.

FISHERIES AND MARINE LIFE

The proposal is fundamentally flawed due to several critical deficiencies in its assessment of fisheries and marine life, which do not adequately address ecological or

socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry. However, the application fails to provide assurances that these vital uses and habitats will be protected from significant disruption.

One of the major shortcomings of the proposal is the assumption that fishing activity can simply be displaced without repercussions. The application lacks any evidence to support the claim that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure that displacement would cause. This oversight is crucial, as it poses a risk of overfishing in alternative areas and could have broader economic implications for the local fishing fleet. Without a comprehensive, evidence-based assessment, the potential impacts on fisheries and local livelihoods remain obscure.

The application further jeopardises marine species, particularly due to the underwater noise expected from construction activities. The high-energy hammer piling proposed is likely to generate disturbances that extend over considerable distances, impacting species such as dolphins. Concerns are particularly raised regarding the predicted effects on a significant portion of the local bottlenose dolphin population. Despite these serious implications, the application downplays these impacts without providing adequate supporting evidence.

A notable inconsistency exists within the application itself, acknowledging the necessity of licenses to permit harm to European Protected Species while simultaneously describing the impacts as negligible. This contradiction raises questions about the validity of the assessment and compliance with the Habitats Regulations, especially when harm is anticipated to a degree that necessitates legal approval.

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

From a policy standpoint, the application falls short of demonstrating compliance with National Planning Framework 4 and the National Marine Plan. It does not substantiate how the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, ultimately failing to establish that the proposal represents sustainable development.

In summary, the combination of inadequate evidence regarding fishing displacement, underestimation of acoustic impacts, and internal inconsistencies renders the assessment fundamentally incomplete and unreliable. These shortcomings obstruct a meaningful evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the standards for sustainable development. It does not satisfy statutory duties, national policy, or evidential standards. Similar issues were present in the rejected 2008 Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. The current application is under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

There are significant gaps in the information provided. The application relies on an undefined design envelope and on unspecified mitigation measures, which are critical oversights. Essential impact pathways have been omitted, such as those concerning nocturnal wildlife, complete onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete and does not allow for a thorough understanding of potential significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which breaches statutory obligations under the Islands (Scotland) Act 2018. The failure to present a full Social Impact Assessment represents a significant omission. These shortcomings hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal contradicts the National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and cannot provide evidence of a net economic benefit due to the lack of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been assessed properly, leaving significant impacts on peatlands, carbon balance, habitats, and crofting land obscured.

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

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

In summary, the application is both procedurally and substantively unfit for determination. The numerous information deficiencies, combined with policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. Therefore, the competent authority should refuse consent or require the submission of

the missing information. A formal request is made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

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: 81B417DE

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and its supporting materials reveals significant 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 proposal's scale, proximity to the shoreline, and design, all of which question its compatibility with statutory requirements, national policy, and sustainable development principles.

The application lacks a robust evidential basis necessary for a lawful determination. There is a critical absence of essential environmental data, while the baseline information provided is both limited and inconsistent. Several key aspects of the proposal are undefined, and the flexible design framework used hinders a comprehensive understanding of the potential significant effects. Furthermore, the reliance on unspecified mitigation measures renders any assessment of their effectiveness impossible. Consequently, the documentation fails to provide a complete and informed overview of the environmental, cultural, or community impacts, and the claims of negligible or non-significant effects lack solid evidence.

The proposal faces clear and substantial policy conflicts. It appears to be inconsistent with 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. The application does not sufficiently demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests required for consent and hinder the competent authority's capacity to deem the development acceptable from a policy standpoint.

Given the unprecedented scale of the proposal in this location, with large turbines situated close to the shoreline, there are significant 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 incapable of supporting a lawful determination. In light of these issues, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is inadequate and fails to deliver a comprehensive and trustworthy evaluation of the potential environmental consequences of the proposal. The introduction of a flexible Project Design Envelope, which lacks specific commitments to turbine dimensions, layouts, or configurations, creates considerable uncertainty. This uncertainty hinders the effective application of a worst-case scenario, ultimately compromising the assessment's integrity. Consequently, the impacts outlined may not accurately represent the development that will be constructed, preventing both the public and the competent authority from grasping the true scale of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that are yet to be clearly defined. Seeking consent on the premise that environmental harm will be rectified at a later stage undermines 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 mandates that likely significant effects and mitigation measures be clearly established prior to determination.

Additionally, there are major evidential shortcomings, including gaps in baseline data, methodological limitations, and reliance on assumptions instead of site-specific evidence. This leads to uncertainty about the magnitude and significance of impacts, especially where negligible or non-significant effects are claimed without adequate supporting data. The lack of sufficient information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainties that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This scenario invokes the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal also fails to align with National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity, as it is unable to demonstrate that impacts have been thoroughly assessed or that suitable safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of clearly specified mitigation measures, and 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, leaving the competent authority unable to make a determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to adequately identify or assess protected species. This deficiency introduces a level of uncertainty that 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.

The assessment of marine ecology and protected species is significantly flawed and fails to provide a comprehensive understanding of the ecological receptors in the West Lewis coastal environment, which is a biologically active and sensitive marine system. The methodologies employed are insufficient, resulting in incomplete baseline data that does not reliably capture the presence, behaviour, and habitat use of various species. Consequently, the evidential basis for evaluating potential impacts is weak.

A significant oversight pertains to otters, classified as a European Protected Species, with the application not adequately recognising their active utilisation of coastal areas for foraging and movement. The neglect of their core foraging range and behavioural patterns results in an insufficient assessment of the potential impacts of construction disturbance, noise, and increased activity, undermining any conclusions regarding the absence of significant effects on this species.

Moreover, there are notable shortcomings in the assessment of basking sharks, particularly due to the reliance on aerial surveys, which introduce considerable detection bias, especially under Atlantic conditions. This methodology is likely to lead to an underestimation of the sharks' presence, particularly when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to properly consider such data contributes to an incomplete baseline, further diminishing the reliability of the presented conclusions.

These methodological shortcomings imply that conclusions of negligible or non-significant effects are derived from assumptions rather than sound evidence. The lack of adequate baseline data also inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating ambiguity about the actual level of risk posed to marine species and habitats.

In summary, the combined issues of incomplete baseline data, inadequate methodologies, and unfounded conclusions result in an unreliable assessment. These shortcomings hinder a thorough evaluation of the impacts on marine ecology and protected species, ultimately demonstrating that the application lacks a solid evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment inadequately addresses cultural heritage and community identity, overlooking the West Lewis coastline as a vibrant cultural landscape where environment, language, tradition, and community are deeply interconnected. Rather than recognising heritage as an evolving entity with social, cultural, and spiritual significance, the application simplifies it into isolated, static assets.

Particularly concerning is the treatment of culturally significant sites, including the cemeteries at Dalmore, Bragar, and Barvas, which serve as active places for burial and

spiritual practice. The assessment categorises these sites as static features, ignoring their continued relevance and the impact that development could have on their settings. This mischaracterisation leads to an incomplete understanding of cultural effects and neglects their importance to community life.

Furthermore, the assessment fails to account for intangible cultural heritage, such as the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are vital to the area's identity yet are completely overlooked, which represents a significant gap in the analysis. Without considering these aspects, the true cultural impact of the development remains unclear.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, with its unique cultural identity recognised as Indigenous, has not been afforded a process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the validity of the assessment and disregards well-established principles that emphasise participation in decisions impacting cultural and environmental matters.

Moreover, a critical procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. The failure to conduct this assessment obstructs the competent authority from fulfilling its legal obligation to evaluate social, cultural, and economic impacts on the island community. This alone undermines the lawfulness of the determination.

From a policy perspective, these deficiencies directly conflict with National Planning Framework 4, especially regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage and the disregard for living cultural practices clearly diverge from required policy standards.

Collectively, the oversight of living heritage, intangible cultural values, community rights, and statutory obligations results in a considerable evidential gap. The cultural impacts of the proposed development have not been thoroughly evaluated, and the application fails to offer a robust foundation for understanding the genuine cultural cost associated with it.

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

character.

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

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

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

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

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

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

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

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 significantly neglects the assessment of dark skies and nocturnal wildlife, which represents a substantial shortcoming in the Environmental Impact Assessment. The West Lewis coastline is known for its remarkably dark skies, which are vital to the environmental quality, cultural identity, and tourism potential of the region. However, the introduction of permanent red aviation lighting, visible over extensive distances, would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

Furthermore, the application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly important given the role of dark skies in shaping the area's identity and the emergence of tourism sectors such as astro-tourism. As a result, there exists a clear gap in the overall assessment of landscape and environmental factors.

Of even greater concern is the absence of evaluation regarding impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel exhibit high sensitivity to artificial lighting due to phototaxis, leading to disorientation and increased collision risk. The application does not contain any lighting impact assessment or phototaxis study, thus failing to consider how aviation lighting might affect these species or potentially increase their mortality rates.

This lack of nocturnal assessment is further exacerbated by the reliance on daytime survey data within the ornithological evaluation, which overlooks nocturnal activity and associated risks. Other species, such as Kittiwakes, which may forage or migrate during the night, are also at risk of disorientation from artificial lighting; however, this has not been adequately assessed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be satisfied, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, these omissions are in direct conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. Furthermore, they compromise the comprehensive assessment of landscape and seascape impacts, as the character of the night-time environment is an integral component of the overall ecological setting.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a significant failure to meet the standards of sustainable development as mandated by statutory duties, national policy, and evidential requirements. This application brings forth the same core issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was clearly highlighted. Now, it is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for the determination of this application is neither complete nor reliable. It suffers from critical gaps in baseline data, the use of an undefined design envelope, an over-reliance on unspecified mitigation measures, and a failure to address key impact pathways such as nocturnal wildlife, the full scope of onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, leaving significant effects and residual impacts inadequately understood.

Moreover, there are notable procedural failures present. The lack of a compliant Island Communities Impact Assessment is a breach of statutory duty under the Islands (Scotland) Act 2018, and the omission of a comprehensive Social Impact Assessment is a serious material shortcoming. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for a lawful determination.

In direct contradiction to National Planning Framework 4, the proposal fails to provide evidence of biodiversity protection, preservation of natural places, and safeguarding of cultural heritage. It does not substantiate that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore elements have not been adequately assessed, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in parts. The evidential threshold necessary to confidently exclude adverse effects has not been achieved, thereby invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of the impacts.

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

Taken as a whole, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, combined with policy conflicts

and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority must either refuse consent based on these grounds or invoke relevant regulatory provisions to demand the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: A675197E

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 relevant marine licensing and Environmental Impact Assessment regimes. Concerns arise from a review of the Environmental Impact Assessment Report and associated documents, highlighting significant deficiencies in planning, environmental considerations, cultural impacts, and procedural integrity. The proposed development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity.

The unprecedented scale of the proposal, with large turbines sited close to the shoreline, raises alarm over landscape capacity, visual impact, and broader environmental implications. The application does not provide a sound evidential basis for a lawful determination, as it lacks critical environmental data, and baseline information is both limited and inconsistent. Additionally, important aspects of the proposal remain undefined. The flexible design framework employed prevents a comprehensive understanding of potential significant effects, while unverified mitigation measures hinder the ability to evaluate their efficacy. Consequently, the supporting documents fail to facilitate a full understanding of the environmental, cultural, and community impacts, rendering claims of negligible or non-significant effects unsupported by solid evidence.

Moreover, the application presents clear conflicts with established policy. It appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The proposal does not prove that it can meet national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These conflicts are directly relevant to the statutory tests required for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

In light of the lack of adequate information, reliance on undefined mitigation strategies, evidential shortcomings, and evident policy non-compliance, it is clear that the application is incomplete and fails to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and lacks a comprehensive, transparent, and dependable account of the potential environmental impacts associated with the proposal. The adoption of a flexible Project Design

Envelope, which does not commit to specific dimensions, layouts, or configurations for turbines, introduces considerable uncertainty. This uncertainty hinders a consistent application of a worst-case scenario analysis, thereby compromising the integrity of the assessment. As a result, the projected impacts may not accurately reflect the development that is ultimately realised, which obstructs both public understanding and the ability of the competent authority to grasp the full extent of the environmental consequences.

Furthermore, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be established. This approach seeks consent on the premise that any environmental harm will be rectified at a subsequent stage, which complicates a meaningful evaluation of their effectiveness and the assessment of residual impacts. Such a postponement of critical information to post-consent phases is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which stipulates that significant effects and their mitigation must be distinctly identified before a determination is made.

Significant evidential deficiencies also exist within the application, marked by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than robust, site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially in instances where conclusions regarding negligible or non-significant effects are drawn without adequate supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainties that cannot satisfy statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot substantiate that impacts have been comprehensively evaluated or that suitable safeguards are in place.

In summation, the reliance on an undefined design envelope, the absence of specific mitigation measures, and the notable gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings prevent a lawful and thorough assessment of environmental effects, leaving the competent authority incapable of making a determination based on the information provided.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is insufficient and does not properly reflect the extent of change or the sensitivity of the environment. The West Lewis coastline is characterised by its open Atlantic horizon and a strong sense of remoteness. The addition of large-scale turbines near the shoreline would create a

dominant industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape.

The application fails to accurately depict the magnitude of the visual change. Given the size and closeness of the turbines, they 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 effectively communicate the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This raises the possibility that the magnitude of visual impact has been underestimated, which undermines the credibility of the assessment.

Moreover, there is a failure to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape connected to the Atlantic horizon through visual and spatial relationships. The assessment treats these sites as isolated rather than acknowledging their interdependence, leading to an incomplete understanding 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 perceived and breaking their link to the natural horizon. This change represents not only a visual impact but also a wider cultural and spatial harm that has not been sufficiently evaluated in the application.

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

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

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

CONSTRUCTION AND POLLUTION RISKS

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

This reliance on unspecified future measures is concerning due to the sensitivity of the receiving environment. The West Lewis coastline features clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental spills of chemicals or oil, it fails to provide adequate detail on the methods for preventing, controlling, or monitoring these risks.

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

Additionally, the lack of detailed emergency response procedures heightens these concerns. By postponing contingency planning to after consent, the application hampers the ability to evaluate whether suitable safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the capacity of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed before granting consent, and when such information is absent, a lawful determination cannot be reached. The application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, the absence of detailed management plans, and the uncertainty about potential impacts render the assessment materially deficient. These issues hinder a thorough evaluation of construction and pollution risks and further confirm that the application is incomplete.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to include any evaluation of dark skies and nocturnal wildlife, which represents a significant omission. The coastline of West Lewis is known for its exceptionally dark skies, an essential aspect of its environmental quality, cultural identity, and tourism potential. The proposed development introduces

permanent red aviation lighting that is visible over extensive distances, resulting in a continuous and intrusive “wall of light” effect on the western horizon that would drastically change the night-time environment.

There is no consideration of how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This lack of assessment is particularly concerning given the significance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to address these factors highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application neglects to evaluate the impacts of this lighting on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can result in disorientation and a higher risk of collisions. Without a dedicated lighting impact assessment or phototaxis study, the application does not assess how the proposed aviation lighting could affect these species or potentially increase their mortality rates.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to capture nocturnal activities and associated risks. Kittiwakes, for example, may forage or migrate at night and are susceptible to disorientation from artificial lighting; however, this risk has not been evaluated. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

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

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

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

TOURISM

The evaluation of tourism impacts presented in the application is notably inadequate, omitting critical insights into the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Although it is acknowledged that 86% of visitors are attracted by the scenery, the application fails to provide a

quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

This sector has experienced considerable growth, with tourism revenue increasing from £65 million in 2017 to over £81.5 million and sustaining more than 1,000 jobs, which represents up to 16% of the island's economy. However, the application neglects to model the potential effects of seascape industrialisation and loss of environmental quality on Tourism Gross Value Added and broader economic resilience. Such an oversight prevents the determination of whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Furthermore, the assessment does not adequately address the significance of environmental quality for tourism, particularly regarding how unspoiled landscapes and dark skies enhance visitor experiences and foster emerging markets like nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment exacerbates this shortcoming, resulting in a considerable gap in understanding impacts on an acknowledged and growing component of the local economy.

In an island community with limited economic diversity, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The lack of a compliant Island Communities Impact Assessment means that these economic vulnerabilities remain unevaluated, as required under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially regarding economic impact and the necessity to show net benefits. It also runs counter to strategic objectives that prioritise tourism as a growth sector, and insufficient evidence is presented for the competent authority to assess the economic consequences of the proposal.

Overall, the shortcomings in quantifying tourism impacts, evaluating the environmental factors that drive visitor behaviour, and recognising the economic dependencies of the island culminate in a significant evidential gap. This gap undermines a robust assessment of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the 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

The impact of having so many wind turbines of such magnitude so close to the Isle of Lewis will not only have a detrimental effect on tourism, one of the island's biggest income generators, but it will also destroy the beauty of the landscape, the peace of the days and nights and will have an impact on our waters, sea and bird life. I understand

that innovation is required but with so much ocean, couldn't alternatives be sought where nature - human, sea, bird, environment - are not impacted in such a horrific way?

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 2A96CD29

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted under marine licensing and Environmental Impact Assessment regimes. The objection arises from an examination of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns about the proposal's scale, proximity, and design call into question its compliance with statutory requirements, national policy, and sustainable development principles.

The application does not provide a sufficient evidential basis for a lawful determination. There is a lack of critical environmental data, limited and inconsistent baseline information, and essential aspects of the proposal remain undefined. The reliance on a flexible design framework inhibits a clear understanding of potentially significant effects, and the unspecified nature of mitigation measures raises questions about their effectiveness. Consequently, the documentation fails to offer a complete and informed perspective on environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantive conflicts with policy are evident. The proposal seems inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability in policy terms.

The unprecedented scale of the proposal raises alarm, with large turbines planned close to the shoreline, creating significant issues around landscape capacity, visual dominance, and environmental impact. In light of insufficient information, reliance on undefined mitigation, evidential weaknesses, and clear policy non-compliance, it is evident that the application is incomplete and unable to support a lawful determination. In this context, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks the necessary comprehensiveness and transparency, leading to an unreliable depiction of the potential environmental consequences of the proposed development. The incorporation of a flexible Project

Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This aspect obstructs a consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. As a result, the environmental impacts presented may not accurately represent the final development, hindering both public understanding and the competent authority's capacity to gauge the true extent of the environmental effects.

The application places significant reliance on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent under the premise that environmental harm will be managed later precludes any substantive evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent phases is procedurally unsound and contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation measures are clearly delineated prior to determination.

Furthermore, there are notable evidential deficiencies, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. These issues lead to uncertainty regarding the magnitude and significance of impacts, particularly where findings of negligible or non-significant effects are advanced without robust supporting data. The lack of adequate information inhibits a clear comprehension of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory obligations.

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

In summary, the deficiencies arising from the undefined design envelope, the absence of specified mitigation strategies, and the gaps in baseline data contribute to an Environmental Impact Assessment Report that is both unreliable and incomplete. These shortcomings impede a lawful and rigorous assessment of environmental effects, leaving the competent authority unable to make an informed determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a comprehensive assessment of alternatives, which is crucial for compliance with the Environmental Impact Assessment regime. Instead of offering a systematic and reasoned comparison of viable alternatives grounded in environmental considerations, it presents a narrative about the project's development. This approach does not adequately demonstrate that less harmful options have been

thoroughly identified, evaluated, and preferred over more detrimental solutions.

There is a lack of transparent, evidence-based comparisons concerning alternative offshore locations, development scales, or design configurations. Notably, the developer has not convincingly explored the possibility of positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be mitigated. The West Lewis coastline is particularly sensitive, and the pivotal role of proximity to shore in assessing impact means that the failure to include such analysis undermines the conclusion that the proposed siting is the least damaging option available.

Furthermore, deficiencies extend to the assessment of cable routing and landfall, where insufficient evidence exists to show that alternative routes have been adequately considered to avoid or minimise impacts on sensitive receptors. This includes significant cultural and spiritual sites, such as Barvas Cemetery. The lack of a clear avoidance strategy, combined with an absence of comparative analysis, indicates that the principle of mitigation by design has not been employed, leading to an overreliance on post-design mitigation measures.

Consequently, the application does not show that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy inhibits the competent authority's ability to ascertain whether more suitable and less harmful alternatives could exist. The absence of a robust alternatives assessment also raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community well-being. The omission of a structured and comparative assessment is a significant shortfall that leads to the conclusion that the application has not been sufficiently examined and cannot warrant a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies that compromise the understanding of ecological receptors within the West Lewis coastal environment. This marine system is both sensitive and biologically active. However, the baseline data provided is incomplete, and the methodologies employed do not adequately capture the presence, behaviour, and habitat use of key species. Consequently, the assessment fails to establish a solid evidential basis for evaluating potential impacts.

Among the notable omissions is the failure to properly recognise and assess the presence of otters, which are a European Protected Species. The application overlooks their active use of coastal areas for foraging and movement, neglecting to consider their core foraging range and behavioural patterns. This oversight means that the possible

impacts of construction disturbance, noise, and increased activity have not been sufficiently evaluated, thus undermining any claims regarding the lack of significant effects on this species.

Additionally, the assessment of basking sharks is inadequate, relying on aerial surveys that introduce significant detection bias, particularly in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared with established land-based observations that indicate their frequent use of these waters. The failure to incorporate relevant data weakens the reliability of the conclusions drawn and contributes to an incomplete baseline.

These methodological weaknesses lead to conclusions about negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data obstructs a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This results in uncertainty regarding the actual risks faced by marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify or assess protected species. The uncertainties introduced prevent the exclusion of adverse effects beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these conditions, consent cannot be legally granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant shortcomings that fundamentally undermine its credibility. Key foraging areas and migratory pathways critical to the internationally important seabird populations along the west coast of the Isle of Lewis are not adequately addressed. Despite the development being located within these vital zones, the assessment fails to convincingly demonstrate, to the necessary evidential standard, that these species will not be adversely affected. The implications of potential displacement, collision risk, and habitat loss are insufficiently evaluated.

Moreover, a notable contradiction exists in the application, as the developer asserts there will be no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is typically required only when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by solid evidence.

The assessment does not adequately establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds is inadequately acknowledged, and the reliance on modelling methods creates further uncertainty, particularly for species already in severe decline, like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality rates, especially in light of incomplete baseline data and insufficient understanding of species' behavioural responses.

The siting of turbines within a recognised migratory corridor poses additional risks, effectively creating 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 impacts on species with relatively small global populations, are not properly assessed.

From a regulatory standpoint, the application fails to fulfil the evidential threshold necessary to assert 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 invokes the precautionary principle, precluding a lawful conclusion that would support consent.

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

In conclusion, the assessment is rendered unreliable by its internal inconsistencies, methodological flaws, and insufficient evidence. These issues inhibit a thorough evaluation of the impacts and culminate in the assertion 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 is fundamentally inadequate, adopting a reductive approach that treats heritage as a series of isolated, static assets. This failure to acknowledge the ongoing social, cultural, and spiritual functions of these elements within the community is a critical oversight.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas represent active places of burial and spiritual practice. Yet, the assessment inaccurately categorises them as static features, neglecting their continued use, meaning, and the potential impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects, disregarding their essential role in community life.

Moreover, the assessment does not consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, marking a significant omission that prevents a proper understanding of the cultural impact of the development.

Community rights and engagement further exacerbate the situation. The Gaelic-speaking population possesses a distinct cultural identity with recognised characteristics of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation regarding decisions that affect cultural and environmental interests.

A critical procedural failure lies in the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, which is a significant omission that prevents lawful determination.

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

Collectively, 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 properly assessed, and the application does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

Furthermore, there is evidence indicating that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. These

impacts have not been fully incorporated into the main application or given the weight they deserve. Thus, the failure to disclose the complete Social Impact Assessment obscures the true human and social cost associated with the development.

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

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

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

Concerns regarding methodology arise from the selection and presentation of visual viewpoints. Evidence indicates that certain viewpoints may not adequately reflect the

most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been understated, thereby compromising the reliability of the assessment.

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is fundamentally inadequate and lacks the necessary detail to appraise the likely environmental effects. The proposed project entails significant seabed preparation and installation activities within a challenging Atlantic environment, yet fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on unspecified mitigation and contingency measures to be formulated after consent, which precludes any thorough evaluation of their sufficiency or effectiveness.

This reliance on vague future actions raises serious concerns due to the sensitivity of

the surrounding environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it does not offer adequate details on how these risks will be mitigated, controlled, or monitored.

Furthermore, there remains uncertainty about the scale and behaviour of sediment plumes resulting from seabed disturbances and cable installations. In the absence of robust modelling and clearly delineated management strategies, it is impossible to assess the extent, duration, or ecological consequences of these impacts. This uncertainty also applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of detailed emergency response procedures only exacerbates these issues. By postponing contingency planning until after consent, the application undermines the evaluation of whether sufficient safeguards are in place to address pollution incidents. This situation introduces procedural risks and impairs 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 requirements of the Environmental Impact Assessment regime. Significant effects and mitigation strategies must be assessed prior to granting consent, and the absence of such information means a lawful determination cannot be achieved. Moreover, the application does not adequately demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, absence of detailed management plans, and uncertainty surrounding potential impacts make the assessment materially deficient. These flaws obstruct a thorough evaluation of construction and pollution risks and further indicate that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a thorough assessment of the onshore infrastructure, which is essential for understanding the full impacts of what is a single integrated project. The offshore turbines and onshore works are closely interconnected, yet they have been evaluated separately. This fragmented approach obscures the true scale of both environmental and socio-economic effects.

Onshore elements consist of cabling that crosses protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure that traverses sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. The lack of a comprehensive impact assessment for these onshore elements prevents a complete understanding of the project's overall environmental footprint.

By neglecting to assess onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project components be considered collectively; however, the division between offshore and onshore assessments means that the combined impacts on peatlands, habitats, and communities remain unclear.

Furthermore, there are considerable risks posed to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures have been implemented. This indicates a significant evidential gap regarding biodiversity protection.

Concerns about carbon balance are also raised by the proposal. Disturbing peatland can release stored carbon, leading to a potential carbon debt that contradicts the goals of renewable energy initiatives. The application falls short in adequately addressing this concern or in demonstrating that the overall carbon balance remains favourable.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the required consents or processes have been undertaken, prompting questions about deliverability and lawful implementation.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances. This creates a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. 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.

There is a significant absence of assessment regarding the impact of this lighting on visual amenity, landscape character, and the experiences of residents and visitors. This gap is particularly notable given the growing importance of dark skies to local identity and emerging sectors such as astro-tourism. The Environmental Impact Assessment does not evaluate how the proposed lighting may affect these crucial aspects.

Equally concerning is the lack of evaluation regarding impacts on nocturnal wildlife. Several species, including Manx Shearwater, European Storm Petrel, and Leach's

Storm Petrel, are highly sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application does not provide a lighting impact assessment or phototaxis study, meaning it fails to consider how the proposed aviation lighting could affect these species or contribute to increased mortality.

Moreover, the reliance on daytime survey data in the ornithological assessment fails to capture nocturnal activity and related risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation due to artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a crucial gap in understanding potential ecological impacts.

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet sustainable development requirements when evaluated against statutory duties and national policy. It echoes the significant issues that led to the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. This current application is presented under a stronger policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it remains insufficient.

There are significant gaps in the evidential basis for this application. It relies on an undefined design envelope and mitigation measures that have not been clearly specified. Key impact pathways, including those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of the likely significant effects or any residual impacts.

Furthermore, there are procedural shortcomings that must be addressed. The lack of a compliant Island Communities Impact Assessment breaches the statutory duties set out in the Islands (Scotland) Act 2018. In addition, the failure to disclose the complete

Social Impact Assessment represents a critical omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

The proposal also conflicts directly with National Planning Framework 4. It does not sufficiently demonstrate the protection of biodiversity, natural areas, or cultural heritage. Moreover, it fails to confirm 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 assessment of cumulative impacts, both offshore and onshore, has not been adequately conducted, leaving unresolved effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties around environmental risks remain significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent at times. The required evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and undermining the legitimacy of concluding that the impacts are acceptable.

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, and the disruption of cultural and visual relationships, along with the impacts on tourism, are permanent consequences that cannot be mitigated adequately.

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

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

Additional Comments

Our culture and heritage are being completely disregarded with the plans for this wind farm. Our families have lived and worked on this island for centuries and it is heartbreaking to think of how these proposals could destroy the place. The impact on humans, animals, birds and the environment is hugely significant and should not be ignored in the name of profits.

The island does not have the capacity to deal with an influx of thousands of workers during the construction phase either. Our health services are already at capacity and won't be able to cope with extra pressure from so many extra residents.

Similarly, the transport systems to the island are not equipped to deal with so many

extra people and vehicles. Life is already hard enough for islanders without extra external pressures adding to systems that are already at breaking point.

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: 202EB0AD

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies associated with the development. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents critical gaps in environmental data, and baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined, leading to ambiguity regarding likely significant effects. The flexible design framework employed complicates the assessment further, as it relies on unspecified mitigation measures, rendering it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a complete understanding of potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by credible evidence.

Moreover, the application shows clear conflicts with established policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The applicant has not sufficiently demonstrated compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are directly relevant to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application cannot be deemed to comply with the evidential threshold mandated under the Habitats Regulations, which necessitates the exclusion of adverse effects beyond reasonable scientific doubt. This situation calls for the application of the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, which includes stipulations regarding biodiversity protection and environmental integrity. It remains unclear whether impacts have been fully assessed or if appropriate safeguards are in place.

Moreover, the application heavily depends on mitigation measures, monitoring strategies, and management plans that are not yet defined. Seeking consent on the premise that environmental harm will be addressed subsequently obstructs any meaningful evaluation of the effectiveness of these measures or an assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment regime, which mandates the clear establishment of likely significant effects and mitigation before determination.

Additionally, there are considerable evidential deficiencies present, such as gaps in baseline data and limitations in methodology, which are coupled with a reliance on assumptions instead of site-specific evidence. This results in ambiguity regarding the scale and significance of impacts, especially when negligible or non-significant effects are presented without robust supporting data. The lack of sufficient information impedes a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

The Environmental Impact Assessment Report is materially deficient, failing to furnish a full, transparent, or reliable account of the probable environmental effects of the proposal. The employment of a flexible Project Design Envelope, devoid of commitment to specific turbine dimensions, layouts, or configurations, injects significant uncertainty into the process and inhibits a consistent application of a worst-case scenario. This undermines the integrity of the assessment and obscures the true extent of environmental effects, preventing both public understanding and competent authority assessment.

In summary, the combination of reliance on an undefined design envelope, absence of specific mitigation measures, and insufficient baseline data culminates in an unreliable and incomplete Environmental Impact Assessment Report. These deficiencies obstruct a lawful and robust assessment of environmental effects, leaving the competent authority incapable of determining the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application significantly lacks a structured and evidence-based assessment of alternatives, which is a critical requirement under the Environmental Impact Assessment regime. Instead of offering a clear and reasoned comparison of viable alternatives based on their environmental effects, it provides a narrative that merely

recounts the project's development. This failure to adequately explore and identify less harmful options means that more damaging solutions may have been improperly prioritised.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species presents significant shortcomings, resulting in an incomplete understanding of the ecological receptors within the West Lewis coastal environment. This marine system is notably sensitive and biologically active. However, the baseline data is inadequate, and the methodologies employed do not effectively capture essential aspects such as species presence, behaviour, and habitat utilisation. Consequently, there is insufficient evidential support for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species, as the application does not adequately recognise or assess their active use of coastal

regions for foraging and movement. The failure to account for their core foraging range and behavioural patterns leads to an incomplete assessment of potential impacts from construction disturbances, noise, and increased activity. This shortcoming undermines the conclusions regarding the absence of significant effects on this species.

Further concerns arise from the assessment of basking sharks, where reliance on aerial surveys introduces a notable detection bias, particularly in the challenging Atlantic conditions. This method is likely to underreport their presence, especially when compared to established land-based observations that show frequent activity in these waters. The disregard for such data results in a flawed baseline, weakening the reliability of the conclusions drawn.

The methodological shortcomings indicate that assertions of negligible or non-significant effects stem from assumptions rather than solid 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 results in uncertainty about the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and the National Planning Framework 4, as it has not properly identified or assessed protected species. The uncertainty generated prevents the elimination of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these factors, the granting of consent cannot be justified legally.

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 overarching conclusion that the application does not provide a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is severely lacking, failing to recognise the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are deeply intertwined. Instead of acknowledging these elements as dynamic and living, the application treats heritage as a collection of isolated and static features, neglecting their ongoing social, cultural, and spiritual roles within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial grounds and places of spiritual practice; however, the assessment erroneously categorises them as static entities, disregarding their continued relevance, significance, and the potential impacts of development on their surrounding environment. This mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their importance in the lives of the community.

Moreover, the application neglects to assess intangible cultural heritage elements, such as the Gaelic language, traditions, and the established relationship between the community and the coastal landscape. These aspects are crucial to the area's identity but are completely absent from the assessment, marking a significant oversight. Without addressing these elements, it is impossible to gain a full understanding of the cultural implications of the proposed development.

There are additional concerns regarding the rights of the community and their engagement in this process. The Gaelic-speaking population has a distinct cultural identity recognised as characteristics of an Indigenous People; however, no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement not only undermines the validity of the assessment but also fails to adhere to established principles of participation in decisions that affect cultural and environmental matters.

A significant procedural oversight is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. The failure to conduct this assessment means that the competent authority is unable to fulfil its legal responsibilities in evaluating the social, cultural, and economic impacts on the island community. This omission alone renders any determination unlawful.

From a policy standpoint, these deficiencies put the proposal at odds with the National Planning Framework 4, particularly concerning the preservation of historic assets and places. The disregard for both tangible and intangible heritage, alongside the failure to recognise living cultural practices, represents a clear breach of policy mandates.

In summary, the neglect to properly assess living heritage, intangible cultural values, community rights, and statutory requirements results in a notable evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not sufficiently support an understanding of the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the installation of large-scale turbines along the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped landscape, and profound sense of remoteness. This development would introduce a continuous and dominant industrial presence that fundamentally alters the region's character, leading to a permanent and irreversible transformation of the landscape.

The assessment of visual impacts associated with this proposal is significantly lacking, failing to accurately represent the magnitude of change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, severely affecting visual amenity and undermining the region's defining qualities of naturalness and remoteness. There is a clear failure to convey the

extent of these impacts and their significance in relation to the sensitive nature of the landscape.

Methodological flaws further compromise the assessment, particularly in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints do not adequately capture the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This raises concerns about the accuracy of the reported visual impact and questions the reliability of the overall assessment.

Moreover, the relationship between landscape, seascape, and cultural heritage has not been sufficiently addressed. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape interconnected with the Atlantic horizon. The assessment treats these heritage assets as isolated entities rather than recognising their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the need to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further erodes any claims of policy compliance.

Finally, it is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. Consequently, the resulting changes are fundamental and permanent, not reducible to an acceptable level through mitigation measures.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and strengthen the argument that the proposal is incompatible with the necessary 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 properly evaluate the likely environmental effects. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included in the application. Instead, it relies on mitigation and contingency measures that are to be prepared after consent,

which prevents any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly alarming given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and important habitats that are at risk of sediment disturbance and contamination. The application does acknowledge risks such as sediment mobilisation and potential chemical or oil spills but fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

The absence of detailed emergency response procedures further amplifies these concerns. By postponing contingency planning to a post-consent stage, the application hinders the evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risks and undermines the ability of the competent authority to assess environmental protection measures at the time of determination.

From a regulatory standpoint, the deferment of critical environmental safeguards contradicts the requirements outlined by the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed before consent is granted, and without this information, a lawful determination cannot be made. 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 the uncertainty regarding potential impacts collectively render the assessment materially deficient. These shortcomings 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 a vibrant marine ecosystem and a thriving fishing industry, yet the current application fails to adequately assess the ecological and socio-economic impacts associated with the proposed development. A significant concern is the assumption that fishing activities can be relocated without negative consequences. The lack of evidence supporting the availability of alternative fishing grounds that are both accessible and capable of handling increased pressure is troubling. This omission poses a risk of overfishing in other areas and may lead to broader economic repercussions for the local fishing fleet. Without a thorough and evidence-based analysis, the implications for fisheries and local livelihoods remain

unclear.

Furthermore, the proposal poses substantial threats to marine species due to underwater noise during construction activities. The extended use of high-energy hammer piling is expected to create disturbances across considerable distances, impacting species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population raises critical issues, yet the application minimises these effects without providing adequate supporting evidence.

The application also contains inconsistencies, particularly regarding the need for licences to authorise harm to European Protected Species, while simultaneously declaring such impacts as negligible. This contradiction raises doubts about the credibility of the assessment and suggests potential non-compliance with the Habitats Regulations, especially when harm is expected to a level that necessitates legal approval.

Moreover, the evaluation neglects to account for cumulative impacts resulting from various pressures, including habitat disruption, noise, and fishing displacement. The absence of a detailed examination of these interconnected effects hinders the ability to assess the overall consequences on marine ecosystems and socio-economic conditions.

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as outlined in statutory duties, national policy, and evidential standards. It revisits the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a stronger policy framework, which emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

Critical gaps in baseline data undermine the reliability of the application, which relies on an undefined design envelope and unspecified mitigation measures. Additionally, key impact pathways have been overlooked, including nocturnal wildlife, full onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment

is incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failures are also evident, notably the lack of a compliant Island Communities Impact Assessment, which breaches the statutory duty under the Islands (Scotland) Act 2018. Furthermore, the incomplete disclosure of the Social Impact Assessment constitutes a material omission that impedes the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These deficiencies render the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4, lacking evidence of biodiversity protection, natural places, and cultural heritage preservation. It also does not demonstrate that health and wellbeing impacts are acceptable or provide evidence of a net economic benefit, particularly due to the absence of tourism impact modelling. Moreover, the cumulative impacts of both offshore and onshore components have not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and barring a lawful conclusion that the impacts are acceptable.

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

In conclusion, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, coupled with policy conflicts and unresolved environmental risks, hinder the capacity for a lawful and evidence-based decision. Therefore, it is requested that consent for the Spiorad na Mara Offshore Wind Farm application be refused in its entirety.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: D157C4BD

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise from the scale, proximity, and design of the proposal, which fundamentally challenge its compatibility with statutory requirements, national policy, and the principles of sustainable development.

A review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application does not provide an adequate evidential basis for a lawful determination, as critical environmental data is absent, and baseline information is both limited and inconsistent. Additionally, many aspects of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of likely significant effects, while unspecified mitigation measures hinder any assessment of their effectiveness. Consequently, the documentation fails to support an informed understanding of environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidence.

Furthermore, there are notable policy conflicts, as the proposal appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This inconsistency is particularly evident in relation to 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. These policy conflicts undermine the ability of the competent authority to determine that the development is acceptable within the required policy framework.

The unprecedented scale of the proposal, with large turbines positioned near the shoreline, introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact. Taken together, the lack of sufficient information, dependence on undefined mitigation, evidential weaknesses, and clear policy non-compliance highlight that the application is incomplete and unable to support a lawful determination. In light of these issues, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application presents a number of serious deficiencies that collectively undermine its validity. The reliance on an undefined Project Design Envelope, which lacks

commitment to specific turbine dimensions, layouts, or configurations, creates significant uncertainty. This lack of clarity obstructs the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the Environmental Impact Assessment Report. As a result, the environmental impacts outlined may not accurately reflect those of the final development, depriving both the public and the competent authority of a proper understanding of potential environmental effects.

Moreover, the application is overly dependent on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. Seeking consent based on the assumption that environmental harm will be managed later is inappropriate, as it precludes a meaningful evaluation of these measures' effectiveness or the assessment of any residual impacts. This deferral of critical information to post-consent stages contradicts the core objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be established prior to determination.

Significantly, there are notable evidential gaps, including a lack of comprehensive baseline data and methodological limitations, along with a reliance on assumptions rather than site-specific evidence. These shortcomings lead to uncertainty regarding the magnitude and significance of impacts. The presentation of conclusions asserting negligible or non-significant effects without robust supporting data further obscures understanding. The lack of sufficient information hinders clarity on cumulative and worst-case impacts, introducing a level of scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not meet the evidential threshold mandated under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to satisfy the requirements of National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity. The inability to demonstrate that impacts have been fully assessed or that appropriate safeguards exist is evident.

In conclusion, the combination of an undefined design envelope, the absence of specified mitigation measures, and significant gaps in baseline data renders the Environmental Impact Assessment Report unreliable and incomplete. These critical deficiencies prevent a lawful and thorough assessment of environmental effects, leaving the competent authority ill-equipped to make an informed decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives within the application is severely deficient, failing to meet the statutory obligations set by the Environmental Impact Assessment regime. It does not provide a structured or reasoned comparison of viable alternatives based on their environmental impacts; instead, it presents a narrative of project development. This methodology does not adequately demonstrate that less harmful options have

been identified, assessed, and chosen over more damaging alternatives.

There is a lack of a transparent, evidence-based comparison concerning alternative offshore locations, development scales, or design configurations. Notably, the application does not establish that the developer has thoroughly considered the possibility of situating turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. The sensitivity of the West Lewis coastline, along with the critical significance of proximity to shore in evaluating impact, underscores the importance of this analysis. The absence of such a consideration obstructs any conclusion that the proposed siting is the least damaging option.

This inadequacy extends to the evaluation of cable routing and landfall, where the evidence presented fails to show that alternative routes have been adequately investigated to mitigate 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 through design has not been employed; instead, the application relies on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, hindering the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a comprehensive alternatives assessment, it cannot be asserted that the proposal constitutes a sustainable or compliant solution in accordance with policy requirements.

From a policy standpoint, this shortcoming undermines adherence to the National Planning Framework 4, particularly regarding the protection of natural environments, cultural heritage, and community wellbeing. The failure to provide a structured and comparative assessment is a significant omission that culminates in the conclusion that the application has not undergone sufficient evaluation to enable a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed development raises significant concerns regarding the assessment of marine ecology and protected species, which is notably inadequate and fails to offer a complete or reliable understanding of ecological receptors in the West Lewis coastal environment. This marine system is highly sensitive and biologically active, yet the baseline data is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidential support for evaluating impacts.

A critical oversight pertains to otters, a species protected under European law, as the application inadequately acknowledges and assesses their active use of coastal areas for foraging and movement. The lack of examination of their core foraging range and behavioural patterns leads to an inadequate assessment of potential effects stemming

from construction disturbances, noise, and increased activity. This gap undermines any conclusions regarding the absence of significant effects on otters.

In addition, the assessment of basking sharks suffers from reliance on aerial surveys, which introduces substantial detection bias, particularly under Atlantic conditions. Such an approach is likely to result in an underestimation of their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or properly consider these data results in an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings lead to conclusions of negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of sufficient baseline data also hinders the meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises questions regarding the true scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it does not properly identify or assess protected species. The degree of uncertainty introduced prevents the exclusion of adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, consent cannot be lawfully granted.

In summary, the assessment's deficiencies, characterized by incomplete baseline data, flawed methodologies, and unsupported conclusions, render it unreliable. These issues obstruct a robust evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application lacks a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity within the application is profoundly lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community intertwine. Instead, the application simplifies heritage into a collection of isolated, static assets, overlooking their ongoing social, cultural, and spiritual roles within the community.

Notably, the assessment inadequately addresses the significance of sites such as the cemeteries at Dalmore, Bragar, and Barvas, which are active burial and spiritual locations. The categorisation of these sites as mere static features fails to consider their continued use and the implications of development on their surroundings. This oversight leads to an incomplete understanding of cultural effects and neglects their integral position in community life.

Moreover, the application disregards intangible cultural heritage, including the Gaelic language and traditions, alongside the community's deep-rooted connection to the

coastal environment. These elements are vital to the area's identity yet are conspicuously absent from the assessment, representing a considerable shortcoming. Without acknowledging these aspects, the cultural ramifications of the proposed development remain inadequately understood.

There are additional issues regarding community rights and engagement. The Gaelic-speaking population, identified as possessing a distinct cultural identity akin to that of an Indigenous People, has not been granted the process of Free, Prior and Informed Consent. This lack of genuine engagement calls into question the legitimacy of the assessment and contradicts established principles regarding participation in matters affecting cultural and environmental concerns.

Furthermore, a significant procedural error exists in the failure to complete a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This alone renders the determination of the proposal unlawful.

From a policy perspective, these inadequacies position the proposal in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of historic assets and locations. The neglect of both tangible and intangible heritage, as well as living cultural practices, clearly deviates from the necessary policy directives.

In conclusion, the cumulative failure to assess living heritage, intangible cultural value, community rights, and to adhere to statutory requirements creates a significant evidential void. The cultural impacts of the development have not been sufficiently evaluated, and the application lacks a robust foundation for understanding the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts is significantly lacking and does not sufficiently account for the extent of change or the sensitivity of the affected environment. The character of the West Lewis coastline is defined by its open Atlantic horizon, its undeveloped nature, and a strong sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would create an ongoing and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible alteration of the landscape.

The application inadequately represents the scale of this visual change. Given the size and proximity of the turbines, they would dominate the views from residential areas, historic sites, and popular coastal locations. This would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment fails to convey the true level of impact or its significance in relation to such a sensitive landscape.

Concerns also arise regarding the selection and presentation of visual viewpoints. There is evidence that the viewpoints selected may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and significant landscapes. This raises the possibility that the extent of visual impact has been underestimated, diminishing the credibility of the assessment.

Furthermore, the assessment neglects to consider the interconnected relationship between landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments exist within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these sites as isolated entities rather than acknowledging their interdependence, resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these relationships, changing the context in which heritage assets are perceived and disrupting their link to the natural horizon. This represents not only a visual impact but also a deeper cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal directly contradicts the National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change is incompatible with the obligation to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any argument of policy compliance.

It is evident that the identified impacts cannot be effectively mitigated. Due to the scale, height, and proximity of the turbines, their presence would be overwhelming and unavoidable. Consequently, 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 depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a dependable evaluation and support the conclusion that the proposal is not compatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of the potential environmental effects related to construction and pollution is inadequate, lacking the detail necessary for a comprehensive evaluation. The proposal entails extensive seabed preparation and installation works in a high-energy Atlantic environment, yet it fails to provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on unspecified mitigation and contingency measures to be created after consent, which hinders any meaningful assessment of their sufficiency or effectiveness.

Given the sensitivity of the receiving environment, this dependence on undefined future measures raises significant concerns. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application recognises risks such as sediment mobilisation and accidental chemical or oil spills, it does not adequately outline how these risks will be prevented, controlled, or monitored.

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

Moreover, the lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether appropriate measures are in place to address pollution events. 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 delay in establishing critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Significant effects and mitigation measures must be evaluated before consent is granted, and the absence of such information means that a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty regarding potential impacts result in a materially deficient assessment. These deficiencies hinder 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 considerable risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended period is expected to cause disturbances over large distances, impacting species such as dolphins. Concerns arise from the predicted disruption to a significant portion of the local bottlenose dolphin population; however, the application tends to downplay these effects without adequate supporting evidence.

An assessment of fisheries and marine life is critically lacking, as it does not provide a thorough evaluation of ecological or socio-economic impacts. The waters off the West Lewis coast sustain both a diverse marine ecosystem and an active fishing industry. Yet, the application fails to illustrate how these vital uses and habitats can be safeguarded or sustained without substantial disruption. There is a fundamental issue

with the assumption that fishing activity can be displaced without consequences. The application offers no evidence that alternative fishing grounds are available, accessible, or capable of withstanding additional pressure. This omission is crucial, as displacing fishing could lead to overfishing in other areas and might result in broader economic repercussions for the local fleet. A clear and evidence-based assessment is necessary to comprehend the impacts on fisheries and livelihoods properly.

Moreover, the application shows an inconsistency regarding the need for licences to permit harm to European Protected Species while simultaneously declaring the impacts as negligible. This contradiction severely undermines the credibility of the assessment and raises concerns about adherence to the Habitats Regulations, particularly when harm is anticipated to such a degree that it requires legal authorisation.

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

From a policy standpoint, the application fails to demonstrate compliance with the National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, which obstructs any conclusion that the proposal represents sustainable development.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, especially when evaluated against statutory duties, national policy, and evidential standards. It echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. Presenting the project now under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing does not address these persistent concerns.

There are significant gaps in the baseline data, and the application relies on an undefined design envelope, which raises questions about the reliability of the evidential basis for determination. The proposed mitigation measures remain unspecified, while crucial impact pathways—such as those affecting nocturnal wildlife, the complete onshore infrastructure, and potential tourism effects—have been omitted. As a result, the Environmental Impact Assessment is incomplete, hindering a comprehensive

understanding of likely significant effects or residual impacts.

Procedurally, there are evident failings as well. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, and the failure to provide the full Social Impact Assessment is a significant omission. Such deficiencies obstruct the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, making the application unfit for determination.

Furthermore, the proposal stands in direct conflict with National Planning Framework 4. It does not adequately demonstrate protection of biodiversity, natural areas, or cultural heritage. There is no evidence of acceptable health and wellbeing impacts, and the absence of tourism impact modelling fails to provide proof of a net economic benefit. The cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to obscured impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and potentially significant. The assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes contradictory. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and prevents a lawful conclusion regarding acceptable impacts.

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

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

For these reasons, a formal request is made 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: A19F1DC1

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 concerns expressed are rooted in a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies.

The development site is situated off the west side of the Isle of Lewis, an area distinguished by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The proposal's scale, design, and proximity to the shoreline raise essential questions about its alignment with statutory requirements, national policy, and sustainable development principles.

Crucially, the application lacks a sufficient evidential basis for lawful determination. There is a notable absence of critical environmental data, with baseline information being both limited and inconsistent. Several key aspects of the proposal are still undefined, and the use of a flexible design framework obscures the likely significant effects. The reliance on unspecified mitigation measures further complicates the assessment, making it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack robust support.

Furthermore, there are clear and significant policy conflicts within the application. It appears to be inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not adequately demonstrate compliance with national requirements aimed at safeguarding biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and diminish the competent authority's ability to deem the development acceptable from a policy standpoint.

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The current application proposes a project that fails to meet the necessary standards required by the Environmental Impact Assessment regime, particularly concerning the assessment of alternatives. Instead of delivering a systematic and reasoned comparison of viable alternatives based on their environmental effects, it offers a narrative that describes the evolution of the project. This narrative does not convincingly show that less damaging options have been properly identified and selected over more harmful solutions.

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, development scales, and design configurations. Notably, the application does not adequately explore the potential for placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be diminished. The sensitivity of the West Lewis coastline and the critical role of proximity to shore in determining impact mean that the absence of this analysis precludes any conclusion that the proposed siting is indeed the least damaging option.

The shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence of a thorough exploration of alternative routes aimed at avoiding or minimising impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear strategy to avoid such impacts and the absence of a comparative analysis suggest that mitigation through design has not been adequately considered, relying instead on measures that would be applied post-design.

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

From a policy viewpoint, these inadequacies undermine alignment with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community well-being. The lack of a structured and comparative assessment is a significant omission, contributing to the conclusion that the application has not been sufficiently evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

robust evidential basis for determining the potential impacts.

Significantly, the assessment fails to appropriately recognise the presence of otters, a species protected under European law, in relation to their foraging and movement along coastal regions. The oversight in accounting for their core foraging range and behavioural patterns means that the potential impacts from construction disturbances, noise, and increased activity have not been thoroughly evaluated. This oversight undermines any claims regarding the absence of significant impacts on otters.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity associated with the proposed development is fundamentally inadequate. It does not recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically linked. The application adopts a reductive approach, viewing heritage merely as isolated, static assets rather than 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 locations are active places of burial

and spiritual practice; however, they are categorised as static features in the assessment. This failure to consider their continued use and meaning, as well as the implications of development on their settings, results in an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Moreover, the application neglects to assess intangible cultural heritage, including the Gaelic language and local traditions. The long-standing relationship between the community and the coastal environment is central to the area's identity, yet these elements are entirely absent from the assessment, representing a significant omission. As such, the cultural impact of the development cannot be fully understood without considering these crucial factors.

There are also significant concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, which aligns with characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural failure is the lack of a compliant Island Communities Impact Assessment, as required under the Islands (Scotland) Act 2018. The absence of this assessment prevents the competent authority from fulfilling its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone hinders a lawful determination of the proposal.

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

In summary, the collective failures to assess living heritage, intangible cultural value, community rights, and adherence to statutory obligations create a significant evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application fails to provide a robust foundation for assessing the true cultural costs of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would result in a continuous industrial presence, fundamentally altering the landscape and leading to a permanent transformation of its character. The assessment of visual, seascape, and landscape impacts is significantly deficient, failing to accurately reflect the extent of change or the sensitivity of the surrounding environment.

The application does not sufficiently convey the magnitude of visual alteration. Due to

their scale and proximity, the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the defining qualities of naturalness and remoteness. This level of impact is not properly articulated within the assessment, nor is its significance considered in the context of such a sensitive landscape.

Concerns also arise from the methodology employed in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This deficiency risks underestimating the magnitude of visual impact, thereby compromising the reliability of the assessment.

Additionally, there is a failure to assess the interconnected nature of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to the wider landscape, linked through visual and spatial relationships to the Atlantic horizon. The assessment treats these assets as isolated rather than acknowledging their interdependence, leading to an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would sever these vital relationships, changing the context in which heritage assets are perceived and disrupting their connection to the natural horizon. This represents a visual impact, alongside broader cultural and spatial harm that has not been adequately examined within the application.

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

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 dominating and unavoidable. Consequently, the change is fundamentally permanent and cannot be reduced to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the scale of impact, the sensitivity of the environment, and the interlinked nature of landscape and heritage. These shortcomings inhibit a reliable evaluation and affirm the conclusion that the proposal is incompatible with the preservation 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 application 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 rich marine ecosystem and an active fishing industry. However, the proposal does not adequately demonstrate that these vital uses and habitats can be safeguarded or sustained without substantial disruption.

A critical flaw in the application is the assumption that fishing activities can be displaced without any repercussions. There is no evidence provided to indicate that alternative fishing grounds are available, accessible, or capable of bearing increased pressure. This lack of information is concerning, as displacement could lead to overfishing in other areas and may have broader economic implications for the local fishing fleet. Without a clear, evidence-based assessment, the potential impacts on fisheries and the livelihoods dependent on them remain poorly understood.

Furthermore, the proposal poses significant risks to marine species, particularly due to the underwater noise resulting from construction activities. The high-energy hammer piling expected to occur over an extended period is likely to cause disturbances across considerable distances, which could adversely affect species such as dolphins. The anticipated disruption to a notable portion of the local bottlenose dolphin population is alarming, yet the application minimizes the importance of these effects without adequate supporting evidence.

In addition, there is a notable inconsistency within the application regarding the requirement for licences to permit harm to European Protected Species, which is acknowledged, while simultaneously asserting that the impacts are negligible. This contradiction undermines the reliability of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is expected to a level that necessitates legal approval.

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

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which prevents 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 collectively render the assessment incomplete and untrustworthy. These issues hinder a robust evaluation of the impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm starkly fails to meet the criteria for sustainable development when measured against statutory duties and national policy. It echoes the critical issues that led to the denial of the Lewis Wind Power proposal in 2008, where the unacceptable level of industrialisation was established. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland conservation, landscape integrity, and community

wellbeing, the application presents serious deficiencies.

There are significant gaps in the evidential basis required for determining the proposal. The use of an undefined design envelope, reliance on unspecified mitigation measures, and crucial omissions in baseline data regarding nocturnal wildlife, full onshore infrastructure, and tourism impacts leave the Environmental Impact Assessment incomplete. This incompleteness hinders a comprehensive understanding of the likely significant effects or residual impacts that may arise from the project.

Procedural failures are also evident in this application. The lack of a compliant Island Communities Impact Assessment constitutes a breach of the statutory obligations outlined in the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a significant omission. These shortcomings impede the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, making the application unsuitable for determination.

The proposal conflicts directly with National Planning Framework 4, as it does not demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. Additionally, there is no assurance that health and wellbeing impacts are acceptable, and the absence of tourism impact modelling undermines claims of a net economic benefit. The failure to adequately assess the cumulative effects of both offshore and onshore elements obscures potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertain and potentially significant environmental risks persist due to incomplete assessments of marine ecology, seabirds, protected species, and marine mammals. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing any lawful determination that impacts would be acceptable.

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

In summary, the application is fundamentally flawed both procedurally and substantively. The overwhelming scale of information gaps, coupled with conflicts with policy and unresolved environmental risks, obstructs a lawful and evidence-based decision-making process. Therefore, it is essential that the competent authority either refuse consent based on these grounds or invoke the appropriate regulatory measures to ensure that the missing information is submitted.

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: 422FDB43

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 relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The scale and design of the development raise serious concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful decision. There are notable gaps in critical environmental data, while the baseline information is both limited and inconsistent. Furthermore, essential elements of the proposal remain undefined. The reliance on a flexible design framework complicates the assessment of likely significant effects, and the proposed mitigation measures have not been specified, rendering their effectiveness impossible to evaluate. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust evidential support.

Substantial policy conflicts are evident. The proposal appears to conflict 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 satisfactorily demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly impact the statutory tests necessary for consent and weaken the competent authority's ability to determine the acceptability of the development in policy terms.

The unprecedented scale of the proposal in this location, with large turbines positioned near the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks material completeness and does not deliver a transparent or reliable account of the expected environmental effects of the proposal. The introduction of a flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations of turbines, creates considerable uncertainty. This situation hinders the consistent application of a worst-case scenario analysis. Consequently, the integrity of the assessment is compromised, meaning that the impacts presented may not accurately reflect the development that will ultimately be constructed. This deficiency obstructs both public and competent authority understanding of the true extent of the environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that environmental harm will be addressed later, which hampers a meaningful evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of crucial information to post-consent stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly established before any determination.

Additional evidential deficiencies are apparent, including incomplete baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. These issues generate uncertainty regarding the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of adequate information obscures a clear understanding of cumulative and worst-case impacts, resulting in scientific uncertainty that is incompatible with statutory requirements.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors in this sensitive marine area. This system is biologically vibrant, yet the baseline data remains inadequate, and the methodologies

used are insufficient for accurately capturing species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application neglects to adequately acknowledge and assess their active utilisation of coastal regions for foraging and movement. This omission in evaluating their core foraging range and behavioural patterns results in an incomplete understanding of how construction disturbance, noise, and increased activity might affect them. This gap undermines any assertions regarding the absence of significant effects on this species.

Further issues emerge in the assessment of basking sharks, where dependence on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. Such an approach likely leads to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits a meaningful examination of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been accurately identified or assessed. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these concerns, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, presenting significant gaps in evidence and internal inconsistencies 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 decline, raises serious concerns. Despite this, the application does not adequately demonstrate that these species will not suffer adverse effects. Key foraging areas and migratory pathways are directly impacted by the development, yet the assessment fails to

thoroughly evaluate the potential risks of displacement, collision, and habitat loss.

A notable contradiction arises within the application itself, as the developer asserts that there will be no significant adverse effects while also advancing a Habitats Regulations derogation case, which is only necessary if significant harm is anticipated. This contradiction undermines the credibility of the assessment and suggests that the conclusions drawn are not substantiated by the evidence provided. Furthermore, the assessment does not convincingly show that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these vital feeding grounds is not adequately considered, and the reliance on modelling approaches introduces a degree of uncertainty, particularly concerning severely declining species like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially in instances where baseline data is lacking and the behavioural responses of the species are not fully understood.

Moreover, the placement of turbines within a designated migratory corridor significantly heightens the risk to avian populations, effectively creating a barrier along a primary flight path that species use while migrating between the United Kingdom and Iceland. The application does not sufficiently assess the long-term repercussions of sustained mortality in this corridor, nor does it consider the implications for species with relatively small global populations.

From a regulatory standpoint, the application falls short of the evidential threshold necessary to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, alongside data gaps and limitations in modelling, indicates that the standard of proof beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, thereby hindering 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 significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment lacks reliability due to its internal inconsistencies, methodological shortcomings, and inadequate evidence. These issues preclude a comprehensive evaluation of impacts and support the overall conclusion that the application does not fulfil the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of cultural heritage and community identity related to the proposed development is fundamentally inadequate. It fails to recognise the West Lewis coastline as a living cultural landscape where environment, language, tradition, and community are intrinsically connected. This application adopts a reductive approach, treating heritage as isolated, static assets instead of acknowledging their ongoing social, cultural, and spiritual functions within the community.

Significant deficiencies exist in the treatment of culturally important sites, particularly the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them as static features. This oversight neglects their continued use, meaning, and the impact of development on their setting, resulting in an incomplete evaluation of cultural effects and disregarding their role in community life.

Moreover, the application does not adequately assess intangible cultural heritage, including the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, which represents a significant omission. The lack of consideration of these factors hinders a proper understanding of the cultural impact of the development.

There are also concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as an Indigenous People, yet no process of Free, Prior and Informed Consent has been undertaken. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to reflect established principles of participation in decisions that affect cultural and environmental interests.

A critical procedural shortcoming is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The absence of this assessment means the competent authority cannot fulfil its legal duty to evaluate the social, cultural, and economic impacts on the island community, preventing a lawful determination.

These deficiencies conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with the lack of recognition of living cultural practices, represents a clear departure from policy requirements.

In summary, the failure to assess 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 properly evaluated, and the application does not provide a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is fundamentally inadequate and does not reflect the true scale of change or the sensitivity of the receiving environment. The coastline of West Lewis, characterised by its open Atlantic horizon and undeveloped nature, exudes a strong sense of remoteness. The placement of large-scale turbines near the shoreline would lead to a continuous industrial presence, fundamentally altering this character and resulting in a permanent transformation of the landscape that is irreversible.

Moreover, the application does not represent the extent of the visual change accurately. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This would directly affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment fails to properly convey the level of impact or its importance in the context of such a sensitive landscape.

Concerns also arise regarding the selection and representation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valuable landscapes. This casts doubt on the assessment's reliability, suggesting that the visual impact may have been understated.

Additionally, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. These sites are treated as isolated elements, failing to recognise their interdependence, which leads to an incomplete evaluation of the impacts on their setting and cultural significance.

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

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

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be dominant and unavoidable. The resultant change is fundamental and permanent, incapable of being reduced to an acceptable level through any form of mitigation.

Collectively, the assessment fails to accurately depict the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in the assessment of construction and pollution risks, leading to an incomplete evaluation of potential environmental effects. It involves extensive seabed preparation and installation activities in a high-energy Atlantic environment, yet lacks fully developed Construction Environmental

Management Plans and Pollution Prevention Plans. Instead, the application suggests relying on future mitigation and contingency measures, which will be established after consent is granted. This approach hinders any meaningful assessment of their adequacy or effectiveness prior to approval.

The sensitivity of the receiving environment amplifies the issues associated with this reliance on undefined future measures. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. While the application does acknowledge risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on prevention, control, or monitoring strategies. Additionally, there is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological impacts of these plumes cannot be determined, raising further concerns for sensitive marine species and habitats identified in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application obstructs the evaluation of whether suitable safeguards are in place to manage pollution events. This creates procedural risks and undermines 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 requirements of the Environmental Impact Assessment regime. Significant effects and necessary mitigation measures must be evaluated before consent, and the lack of this information means a lawful determination cannot be achieved.

Ultimately, the combined absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings prevent a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application lacks a thorough assessment of fisheries and marine life, which results in an incomplete evaluation of both ecological and socio-economic impacts. The West Lewis coast is home to a diverse marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate the ability to protect or maintain these vital uses and habitats without causing significant disruption.

A critical concern is the assumption made regarding the displacement of fishing activity, suggesting that such actions can occur without adverse effects. There is a notable absence of evidence indicating the availability, accessibility, or capacity of alternative fishing grounds to accommodate any additional pressures. This gap is especially troubling, as the risk of overfishing in other areas could have broader

economic repercussions for the local fishing fleet. The lack of a clear and evidence-based assessment impedes the understanding of potential impacts on fisheries and the livelihoods they support.

Furthermore, the proposal poses considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The high-energy hammer piling anticipated over an extended timeframe is expected to disturb marine life across significant distances, specifically affecting species such as dolphins. The predicted disturbances to a considerable portion of the local bottlenose dolphin population are concerning, yet the application tends to minimise these effects without adequate supporting evidence.

The application reveals inconsistencies, notably acknowledging the necessity for licences to permit harm to European Protected Species while simultaneously categorising these impacts as negligible. This contradiction weakens the credibility of the assessment and raises questions about compliance with the Habitats Regulations, especially where anticipated harm would legally require authorisation.

Additionally, the assessment does not account for cumulative impacts that stem from various pressures, including habitat disturbance, noise pollution, 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 alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide sufficient evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thus obstructing any conclusion that the proposal can be classified as sustainable development.

Overall, the deficiencies in the evidence surrounding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of onshore infrastructure is incomplete and does not consider the full impacts of the project as a whole. The offshore turbines and onshore works are linked but are evaluated separately, which leads to a fragmented analysis that obscures the environmental and socio-economic effects.

Onshore works involve cabling across protected moorland, the construction of a substation near Stornoway, and access routes through sensitive landscapes. These activities include excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application lacks a comprehensive evaluation of these impacts, making it difficult to understand the

overall environmental footprint of the project.

By excluding or postponing the assessment of onshore impacts, the application hinders the proper evaluation of cumulative effects. The Environmental Impact Assessment requires that all project components are examined together, yet the disconnection between offshore and onshore elements means the combined effects on peatlands, habitats, and communities are not fully acknowledged.

There are significant risks to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application fails to demonstrate that the impacts on these habitats have been thoroughly assessed or that suitable avoidance measures are in place, highlighting a gap in biodiversity protection.

The proposal also brings up concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially creating a carbon debt that opposes the goals of renewable energy development. The application does not adequately address this matter or show that the overall carbon balance is beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that necessary consents or processes have been initiated, which raises concerns about the feasibility and legality of implementation.

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

Overall, the separation of project components, the lack of a thorough assessment, and insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, making a lawful determination impossible.

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.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm demonstrates a critical failure to meet the standards of sustainable development when evaluated against statutory requirements, national policy, and necessary evidence. This application mirrors the fundamental issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Now, it is being presented under a policy framework that places increased emphasis on biodiversity, peatland preservation, landscape integrity, and the wellbeing of the community.

There is a lack of a complete and reliable evidential foundation for making a determination on this application. Significant gaps in baseline data persist,

accompanied by the use of an undefined design envelope. The reliance on unspecified mitigation measures and the failure to include crucial impact pathways—such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism—are apparent. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a thorough understanding of the significant effects or residual impacts that may arise.

Furthermore, procedural shortcomings are evident. The absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty as outlined in the Islands (Scotland) Act 2018, while the failure to present a complete Social Impact Assessment signifies a material omission. Such inadequacies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal also stands in opposition to National Planning Framework 4, lacking demonstration of biodiversity protection, safeguarding of natural areas, and preservation of cultural heritage. It fails to show that the health and wellbeing impacts are acceptable and cannot prove a net economic benefit due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore components have not been thoroughly evaluated, obscuring consequences for 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 with one another. The evidential threshold necessary to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and obstructing a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unsuitable for determination. The significant information deficiencies, along with conflicts with policy and unresolved environmental risks, preclude a lawful and evidence-based decision. The competent authority must reject this application or invoke the appropriate regulatory measures to compel the submission of the necessary information.

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

Additional Comments

NO MORE!!!!!!

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C6B5D6C2

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, submitted in accordance with the marine licensing and Environmental Impact Assessment processes. The objection is grounded in a thorough evaluation of the Environmental Impact Assessment Report and accompanying documentation, which reveal significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely unspoiled environment, and strong cultural heritage. The dimensions, proximity, and overall design of the project raise essential concerns about its alignment with statutory obligations, national policies, and the principles of sustainable development.

The application lacks a sufficient evidential foundation for a lawful assessment. There is a notable absence of critical environmental data, while the baseline information provided is both limited and inconsistent. Furthermore, key elements of the proposal are not clearly defined. The flexible design framework employed inhibits a comprehensive understanding of the potential significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the documentation fails to facilitate a complete or informed assessment of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsubstantiated by robust evidence.

Substantive conflicts with existing policy are evident. The proposal appears to be at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not demonstrate compliance with national requirements to safeguard biodiversity, climate considerations, and environmental integrity. These inconsistencies directly affect the statutory tests necessary for consent and compromise the competent authority's ability to deem the development acceptable from a policy perspective.

The scale of the project is without precedent in this region, with large turbines proposed in very close proximity to the shoreline. This raises significant concerns regarding the capacity of the landscape, visual dominance, and environmental consequences. In summary, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy inconsistencies illustrate that the application is incomplete and fails to support a lawful determination. In light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable overview of the potential environmental effects linked to the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to definitive turbine sizes, layouts, or configurations, creates considerable uncertainty. This ambiguity compromises the integrity of the assessment, resulting in impacts that may not accurately represent the development that will ultimately be constructed. Consequently, both the public and the competent authority are unable to grasp the true magnitude of the environmental effects.

The application significantly depends on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under these conditions suggests that any environmental harm will be resolved at a later stage, which obstructs a meaningful evaluation of effectiveness and an assessment of residual impacts. This postponement of crucial information until after consent is granted is procedurally inappropriate and contradicts the objectives of the Environmental Impact Assessment framework, which mandates that likely significant effects and mitigation measures must be clearly identified prior to determination.

Moreover, the application reveals substantial evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. These factors lead to uncertainty surrounding the scale and significance of impacts, especially where claims of negligible or non-significant effects are made without adequate supporting data. The lack of sufficient information hinders a clear understanding of cumulative and worst-case impacts, thereby introducing scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and vulnerable habitats. The proposal also fails to demonstrate adherence to the National Planning Framework 4, including its stipulations regarding biodiversity protection and environmental integrity, as it is not evident that the impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and robust evaluation of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to demonstrate that environmental harm has been minimised through appropriate site selection, layout, and routing of infrastructure. This indicates a significant oversight in following the established mitigation hierarchy. Consequently, the competent authority is left without a clear understanding of whether less harmful and more suitable alternatives could be viable. The assessment of alternatives is

fundamentally inadequate and does not fulfil the statutory requirements set by the Environmental Impact Assessment regime. Instead of delivering a structured, reasoned comparison of feasible alternatives based on their environmental impacts, the application merely offers a narrative of project development. This flawed approach does not adequately illustrate that less damaging options have been effectively identified, evaluated, and preferred over more harmful solutions.

Moreover, the application provides no transparent, evidence-based comparison of different offshore locations, scales of development, or design configurations. Notably, it fails to show that the developer has genuinely considered placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be less severe. The sensitivity of the West Lewis coastline, along with the critical importance of proximity to shore in assessing impact, means that the lack of such analysis makes it impossible to ascertain that the proposed siting is the least damaging option available.

The shortcomings are also apparent in the evaluation of cable routing and landfall assessment, which lack sufficient evidence that alternative routes have been explored to minimise impacts on sensitive receptors. This oversight includes locations of cultural and spiritual significance, such as Barvas Cemetery. The absence of a clear strategy for avoidance and the failure to conduct comparative analysis suggest that mitigation by design has not been considered, leading to reliance on measures that would come after the design phase.

From a policy standpoint, these deficiencies hinder compliance with National Planning Framework 4, especially concerning the protection of natural spaces, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment constitutes a material omission, reinforcing the overall conclusion that the application has not been sufficiently assessed and cannot support a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is a highly sensitive and biologically active marine system, yet the assessment of marine ecology and protected species is deeply flawed. The baseline data provided is incomplete, and the methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. This deficiency undermines any valid evaluation of potential impacts.

Particularly concerning is the omission of otters, a European Protected Species, which have not been properly recognised or assessed for their active use of the coastal areas for foraging and movement. The lack of consideration of their core foraging range and behaviour raises significant concerns about the potential effects of construction disturbances, noise, and increased activity. Consequently, this oversight compromises the conclusions drawn about the absence of significant effects on this species.

In addition, the assessment of basking sharks is inadequately addressed, relying on aerial surveys that introduce considerable detection bias, especially in Atlantic conditions. Such an approach is likely to underestimate their presence, especially

when compared to established land-based observations that show frequent use of these waters. This failure to incorporate relevant data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that the findings of negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of adequate baseline data obstructs a meaningful evaluation of cumulative and indirect impacts, which includes seasonal variations and interactions within the broader ecosystem. This uncertainty clouds the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents the assurance that adverse effects can be excluded beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, lawful consent cannot be granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. Such deficiencies obstruct a robust evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sound evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment related to the ornithological impacts is fundamentally flawed, marked by significant gaps in evidence and internal inconsistencies that compromise its conclusions. The application does not satisfactorily demonstrate, to the necessary evidential standard, that internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely affected. Located within key foraging areas and migratory pathways, the development raises concerns that are not adequately addressed, particularly regarding displacement, collision risk, and habitat loss.

A critical inconsistency arises in the application, where the developer asserts there are no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction casts doubt on the assessment's reliability and suggests that its conclusions lack support from the underlying evidence. The evaluation does not sufficiently demonstrate that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not fully taken into account, and the reliance on modelling approaches introduces uncertainty, especially concerning species in severe decline, such as Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly in light of incomplete baseline data and an incomplete understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses an extra significant risk, effectively acting as a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor, as well as the potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application falls short of the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with data deficiencies and modelling limitations, means that the standard of beyond reasonable scientific doubt has not been met. This situation invokes the precautionary principle and hinders a lawful conclusion in favour of consent. The identified deficiencies also indicate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected directly conflicts with national policy.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal currently under consideration has significant deficiencies concerning the assessment of social impacts, health, and wellbeing. The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This lack of transparency results in a considerable evidential gap, which hinders both public understanding and the competent authority's ability to comprehend the full extent of social risks identified in the developer's own research.

Summaries that are available suggest that residents are already experiencing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts arise from direct engagement with the community and are thus grounded in evidence rather than speculation. Nevertheless, the failure to disclose the complete assessment limits the opportunity for proper scrutiny of the findings and restricts the determination of their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is viewed as a direct threat to community identity and cohesion, with findings from the developer identifying "cultural loss." Despite this, these significant impacts have not been adequately integrated into the main application or assigned appropriate weight. Consequently, the withholding of 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 impacts is crucial for developments of this magnitude, particularly when community character and functioning are at stake. The failure to provide the full dataset means the application does not offer a comprehensive evidential basis for evaluating the balance between potential benefits and harms.

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

The procedural implications are considerable. The competent authority cannot perform a robust socio-economic and health evaluation without the complete Social Impact Assessment. This omission represents a material flaw within the application, failing to meet the evidential requirements of the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is significantly inadequate and does not properly reflect the scale of change or the sensitivity of the environment. The open Atlantic horizon and undeveloped character of the West Lewis coastline contribute to a strong sense of remoteness. The proposed large-scale turbines located near the shoreline would create an overwhelming industrial presence, fundamentally changing this character and resulting in a permanent transformation of the landscape.

The application fails to accurately represent the extent of visual change. The scale and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and diminish the qualities of naturalness and remoteness. The assessment does not properly communicate the significance of these impacts within the context of such a sensitive landscape.

There are also concerns about the methodology used to select and present visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, especially regarding key cultural heritage sites and valuable landscapes. This raises the possibility that the visual impact has been understated, which undermines the reliability of the assessment.

Another significant shortcoming is the lack of an evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. The Calanais

Standing Stones and other Scheduled Monuments are part of a broader landscape setting that is visually and spatially linked to the Atlantic horizon. The assessment treats these assets as separate entities, failing to acknowledge their interdependence, which results in 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 breaking their connection to the natural horizon. This represents a broader cultural and spatial harm that has not been adequately assessed in the application, in addition to the visual impact.

From a policy perspective, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of proposed changes is incompatible with the requirement to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust 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 dominant and unavoidable. The resulting changes are thus fundamental and permanent, rather than reducible to an acceptable level through mitigation.

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

CONSTRUCTION AND POLLUTION RISKS

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

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

Furthermore, there is considerable uncertainty regarding the magnitude and behaviour of sediment plumes that may result from seabed disturbance and cable installation.

The absence of rigorous modelling and clearly delineated management strategies makes it impossible to ascertain the extent, duration, or ecological ramifications of these impacts. This uncertainty also extends to the potential effects on sensitive marine species and habitats that have already been identified in the broader assessment.

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

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

In conclusion, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts culminates in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the argument that the application is fundamentally incomplete.

FISHERIES AND MARINE LIFE

The application proposes a development that presents substantial risks to marine species and the local fishing industry. The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing sector. However, the assessment of fisheries and marine life is insufficient, lacking a robust evaluation of both ecological and socio-economic impacts. Notably, the application does not adequately demonstrate how these habitats and activities can be protected or maintained without significant disruption.

A significant concern arises from the assumption that fishing activities can be displaced without any consequences. The application fails to provide evidence that alternative fishing grounds are available, accessible, or capable of supporting increased pressure from displaced activities. This oversight is critical, as it poses a risk of overfishing in other areas and could lead to wider economic repercussions for the local fishing fleet. In the absence of a clear and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Moreover, the proposed development introduces considerable risks to marine species, particularly through the underwater noise produced during construction activities. The use of high-energy hammer piling over an extended period is likely to disturb marine life across extensive areas, with potential effects on species such as dolphins. The

predicted disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns. However, the application tends to downplay the significance of these impacts, lacking sufficient supporting evidence.

There is an evident inconsistency within the application, acknowledging the need for licenses to permit harm to European Protected Species while simultaneously describing these impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns regarding compliance with the Habitats Regulations, particularly where anticipated harm may require legal authorisation.

Additionally, the assessment does not account for cumulative impacts that arise from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, determining the overall impact on marine ecosystems and socio-economic conditions remains unattainable.

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

In summary, the lack of evidence surrounding fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and unreliable. These shortcomings hinder any robust evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a substantial flaw within the Environmental Impact Assessment. The West Lewis coastline is notable for its exceptionally dark skies, which are integral to environmental quality, cultural identity, and tourism appeal. The proposal incorporates permanent red aviation lighting that would be visible over extensive distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon, fundamentally transforming the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of residents and visitors. This omission is critical given the significance of dark skies to the identity of the area and the growth of tourism sectors such as astro-tourism. As a result, there exists a clear gap in the overall landscape and environmental assessment.

Equally concerning is the lack of examination of 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 can cause

disorientation and heighten the risk of collision. The application fails to provide a lighting impact assessment or phototaxis study, leaving unaddressed how aviation lighting may affect these species or lead to increased mortality.

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

In the absence of a proper assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would face adverse impacts. The evidential standard required to rule out negative effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes the National Planning Framework 4 concerning the protection of 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 broader ecosystem.

Collectively, the failure to assess dark skies and nocturnal wildlife presents a major evidential shortcoming. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and incapable of facilitating a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its attempt to meet the requirements for sustainable development, as it does not align with statutory obligations, national policy, or evidential standards. This application revisits the critical issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it fails to provide a reliable and comprehensive evidential basis for evaluation.

Key deficiencies in the application include significant gaps in baseline data, the use of an undefined design envelope, unspecified reliance on mitigation measures, and the omission of essential impact pathways such as nocturnal wildlife, complete onshore infrastructure, and tourism effects. As a result, the Environmental Impact Assessment is inadequate, hindering a full understanding of the likely significant effects and residual impacts.

Additionally, the application suffers from procedural shortcomings. The lack of a

compliant Island Communities Impact Assessment constitutes a violation of statutory duty under the Islands (Scotland) Act 2018, while the incomplete disclosure of the Social Impact Assessment represents a material omission. Such deficiencies prevent the competent authority from effectively assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal is incompatible with National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not provide assurance that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately evaluated, obscuring their impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties and significant environmental risks persist, particularly concerning marine ecology, seabirds, protected species, and marine mammals. The assessments provided are incomplete and occasionally inconsistent, failing to meet the evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt. This engages the precautionary principle, which prohibits a lawful conclusion that the impacts are acceptable.

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

In summary, the application is both procedurally and substantively unfit for determination. The myriad information deficiencies, coupled with policy conflicts and unresolved environmental uncertainties, obstruct a lawful and evidence-based decision. It is imperative that the competent authority either refuse consent on these grounds or invoke the appropriate regulatory measures to obtain the missing information.

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

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: 6F0C63A8

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and the supporting documentation reveals significant deficiencies in material planning, environmental considerations, cultural impacts, and procedural aspects. The site is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The design, proximity, and scale of the proposal raise serious concerns about its alignment with statutory requirements, national policy, and the tenets of sustainable development.

The application does not provide an adequate evidential basis for a lawful determination. There is a lack of critical environmental data, while baseline information is both limited and inconsistent. Moreover, key aspects of the proposal remain undefined. The flexible design framework complicates the assessment of likely significant effects, and reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation does not facilitate a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects unsupported by robust evidence.

There are evident and serious policy conflicts present. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4. These conflicts are especially pertinent in relation to biodiversity, natural environments, cultural heritage, and health and wellbeing. The application fails to demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests necessary for consent and impair the competent authority's capacity to determine the development's acceptability within policy frameworks.

The unprecedented scale of the proposal, with large turbines positioned in close proximity to the shoreline, gives rise to considerable concerns regarding landscape capacity, visual dominance, and environmental repercussions. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential inadequacies, and clear non-compliance with policy highlight that the application is incomplete and unable to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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 fails to provide a structured and evidence-based assessment of alternatives, which is a critical requirement of the Environmental Impact Assessment regime. Instead of offering a reasoned comparison of feasible alternatives based on their environmental effects, it presents a narrative of project evolution that does not

adequately demonstrate that less harmful options have been identified, evaluated, and chosen over more damaging solutions.

There is a clear absence of transparent comparison regarding alternative offshore sites, development scales, and design configurations. The application notably does not show that the developer has seriously considered placing turbines further offshore, where potential visual, ecological, and coastal impacts would likely diminish. The West Lewis coastline's sensitivity and the importance of proximity to shore in assessing impact render this lack of analysis particularly concerning, as it prevents any conclusions that the proposed siting is the least damaging option available.

Moreover, the deficiencies extend to the assessment of cable routing and landfall, where the evidence provided is insufficient to suggest that alternative routes have been adequately explored to avoid or reduce impacts on sensitive receptors. This includes significant cultural and spiritual sites like Barvas Cemetery. The absence of a clear strategy for avoidance and the lack of comparative analysis highlight that mitigation by design has not been considered, leading to a reliance on post-design mitigation measures instead.

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

From a policy standpoint, this deficiency raises serious concerns regarding adherence to National Planning Framework 4, especially in terms of protecting natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment constitutes a material omission that reinforces the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The coastal environment of West Lewis is characterised by its high sensitivity and biological activity, yet the assessment of marine ecology and protected species is significantly lacking. It fails to deliver a comprehensive and dependable understanding of the ecological receptors within this marine system. The methodologies employed do not effectively capture vital details regarding species presence, behaviour, and habitat usage, leading to an assessment that lacks a strong evidential basis for evaluating potential impacts.

One major oversight is the treatment of otters, which are a European Protected Species. The application does not adequately recognise their active use of coastal areas for foraging and movement. The neglect of their core foraging range and

behavioural patterns means that the potential impacts of construction-related disturbances, including noise and increased activity, have not been properly evaluated. This shortcoming undermines any assertions concerning the absence of significant effects on this species.

Additionally, there are notable deficiencies in how basking sharks are assessed. The reliance on aerial surveys introduces significant detection bias, especially under Atlantic conditions, which likely leads to an underestimation of their presence in these waters. This contrasts with established land-based observations that indicate frequent usage of the area by these sharks. By not incorporating or adequately considering this data, the assessment presents an incomplete baseline, which further weakens the reliability of its conclusions.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The insufficient baseline data hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, creating uncertainty about the true risks to marine species and habitats.

From a regulatory standpoint, the application does not comply with the requirements set forth by the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or assessed. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Given these circumstances, consent cannot be granted lawfully.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal is fundamentally flawed due to an incomplete assessment of construction and pollution risks, which lacks the necessary detail to evaluate the likely environmental effects. The West Lewis coastline, characterised by clean coastal waters and significant habitats, is particularly sensitive to disturbances, yet the application does not provide fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be devised after consent, obstructing a meaningful assessment of their adequacy and effectiveness.

Concerns are amplified by the application's acknowledgment of risks such as sediment mobilisation and accidental spills of chemicals or oil, yet it fails to detail how these will be prevented, controlled, or monitored. This reliance on undefined future measures is particularly troubling given the environmental sensitivities involved. Furthermore, there

remains considerable uncertainty regarding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without rigorous modelling and well-defined management strategies, the potential extent, duration, or ecological effects of these impacts cannot be established, leaving the effects on sensitive marine species and habitats inadequately addressed.

Additionally, the absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application effectively undermines the assessment of whether adequate safeguards are in place to address potential pollution events. This introduces significant procedural risks, hindering the competent authority's ability to evaluate the proposed environmental protection measures at the point of determination.

From a regulatory standpoint, the deferment of essential environmental safeguards is in direct conflict with the requirements of the Environmental Impact Assessment regime. It is mandated that likely significant effects and mitigation be assessed prior to consent, and the absence of this critical information renders a lawful determination impossible. The application fails to demonstrate compliance with policy requirements related to environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and clarity regarding potential impacts culminate in a materially deficient assessment. These deficiencies obstruct a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The proposal significantly lacks a thorough assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry. However, the application does not convincingly demonstrate that these vital uses and habitats can be preserved or maintained without considerable disruption.

A critical concern lies in the assumption that fishing activities can be displaced without repercussions. The application does not provide any evidence to suggest that there are alternative fishing grounds that are available, accessible, or capable of accommodating additional pressures. This is a notable omission, as displacement could lead to overfishing in other areas, which may have far-reaching economic consequences for the local fishing fleet. Without a clear, evidence-based assessment, it remains difficult to grasp the impacts on fisheries and livelihoods.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise produced during construction activities. The high-energy hammer piling over an extended duration is likely to disturb marine life across considerable distances, affecting species such as dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious issues, yet the application underplays these impacts without sufficient supporting evidence.

There is a noticeable inconsistency in the application regarding the need for licences to authorise harm to European Protected Species. While this need is recognised, the impacts are concurrently described as negligible. Such contradictions undermine the credibility of the assessment and raise questions about compliance with the Habitats Regulations, especially in instances where harm may necessitate legal authorisation.

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

From a policy standpoint, the application fails to demonstrate 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 avert unacceptable impacts on marine biodiversity, thus hindering any conclusion that the proposal embodies sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project fails to adequately evaluate the onshore infrastructure, resulting in an incomplete understanding of the overall impacts of what is essentially a single integrated project. The separate assessments of the offshore turbines and onshore works lead to a fragmented approach that obscures the actual scale of the environmental and socio-economic consequences.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and necessary access infrastructure through sensitive landscapes. These activities involve excavation in deep peat areas, notably within Barvas Moor, which is a crucial carbon store and an ecologically sensitive environment. Without a comprehensive assessment of these impacts, the application falls short of providing a clear picture of the project's environmental footprint.

By failing to assess the onshore impacts fully or deferring such evaluations, the application hinders an accurate assessment of cumulative effects. It is essential for the Environmental Impact Assessment process to consider all components of a project in conjunction; however, the distinct treatment of offshore and onshore elements leaves the combined impacts on peatlands, habitats, and communities inadequately understood.

There are also considerable risks to sensitive habitats, such as machair systems and peatland environments, which are under policy protection. The lack of demonstrated assessment of impacts on these habitats, along with the absence of appropriate avoidance measures, creates a significant evidential gap concerning biodiversity protection.

The proposal raises serious concerns about carbon balance, as disturbance of peatland can release stored carbon, potentially creating a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance remains positive.

Moreover, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is no evidence provided that the necessary consents or processes have been initiated, leading to uncertainties about the deliverability and lawful implementation of the project.

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

Overall, the separation of project components, the absence of thorough assessment, and the lack of evidence regarding environmental and land use impacts render this part of the application incomplete and untrustworthy, preventing a lawful determination.

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

As an islander who has lived here all my life I remain utterly unconvinced of the economic benefits to the islands of a project of this scale and impact taking place. I am in favour of renewable energy but already Scotland produces vast amounts of wind energy - more than we can sometimes use and yet islanders and highlanders continue to pay more for their energy costs than anyone else in the UK.

My concern is that without projects and infrastructure being considered with the people it directly impacts upon specifically in mind then this is just another drain on the resources of this beautiful part of our country. I am not against development -indeed I

understand the huge importance of it in such a challenging economic environment- but these developments should be of an appropriate scale with direct and significantly more, if not total, local benefit. Not a sellout to a large multinational organisation. Our way of life, our dependence on tourism, and our duty to the unique and precious environment around us should take priority. What legacy are we leaving for the next generation when in 35-40 years there is a turbine graveyard along our beautiful coastline and marine life is decimated once again in the name of progress. Government policies and energy strategies are long overdue an overhaul and the over dependence of a large nation's energy needs on small vulnerable communities should be addressed.

The scale of this proposal is inarguably unacceptable. It is disproportionate and exploitative. Revenues coming to the islands as reward for allowing this huge development will be subject to business needs, global economic forces and the short-term 'get into power' government thinking. The rules will change, the contractual goal posts will be moved and the losers will be the people who live here. The people of the Western Isles will not own this infrastructure, they will not benefit from cheaper utility costs...has history not shown us that local communities don't fare well when powerful individuals or companies see profits. This is the nature of business and not a reflection on the companies involved directly. Hopefully we can look forward to a government who understands the delicate balance of life in this part of the world.

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: 7F71B2FB

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. A thorough review of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies associated with the development. Located off the west side of the Isle of Lewis, the area is characterised by its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. The proposal's scale, proximity to the shoreline, and design raise serious concerns about its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. It presents critical gaps in environmental data, and baseline information is both limited and inconsistent. Many key aspects of the proposal remain undefined, leading to ambiguity regarding likely significant effects. The flexible design framework employed complicates the assessment further, as it relies on unspecified mitigation measures, rendering it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a complete understanding of potential environmental, cultural, or community impacts, and assertions of negligible or non-significant effects are unsupported by credible evidence.

Moreover, the application shows clear conflicts with established policies. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The applicant has not sufficiently demonstrated compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts are directly relevant to the statutory tests required for consent and weaken the competent authority's ability to conclude that the development is acceptable in policy terms.

The unprecedented scale of the proposal, with large turbines situated close to the shoreline, raises substantial concerns about landscape capacity, visual dominance, and overall environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear non-compliance with policy indicates that the application is incomplete and cannot support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks comprehensiveness and fails to deliver a transparent and reliable analysis of the potential environmental consequences of the proposed development. By employing a flexible Project Design Envelope that lacks concrete commitments to specific turbine dimensions, layouts, or configurations, the report introduces considerable uncertainty. This approach obstructs the consistent application of a worst-case scenario analysis, thereby undermining the integrity of the assessment. Consequently, the impacts indicated may not accurately represent the actual development that will be constructed, which in turn hinders both public understanding and the competent authority's capacity to grasp the full extent of environmental implications.

Furthermore, the application places substantial reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any thorough evaluation of the effectiveness of such measures or an assessment of residual impacts. This postponement of critical information until after consent is granted is procedurally unacceptable, as it contravenes the objectives of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation strategies be clearly established prior to determination.

The application also exhibits significant evidential gaps, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty concerning the scale and significance of impacts, especially where conclusions of negligible or non-significant effects are made without robust supporting evidence. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts, thus introducing scientific uncertainties that are incompatible with statutory obligations.

As a result, the application does not fulfil the evidential standards required under the Habitats Regulations to dismiss 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 adherence to National Planning Framework 4, specifically its requirements for biodiversity protection and environmental integrity, as it has not been proven that impacts have been comprehensively assessed or that appropriate safeguards exist.

In summary, the combination of an undefined design envelope, the absence of specific mitigation strategies, and existing gaps in baseline data collectively render the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and thorough evaluation of environmental effects, thereby leaving the competent authority unable to make an informed decision based on the information presented.

ASSESSMENT OF ALTERNATIVES

The West Lewis coastline is particularly sensitive, making the proximity to shore a crucial factor in determining environmental impact. Unfortunately, the assessment of

alternatives within the application is materially inadequate and does not comply with the statutory requirements of the Environmental Impact Assessment regime. Instead of offering a well-structured and reasoned comparison of realistic alternatives based on their environmental effects, the application merely recounts the project's evolution. This narrative approach fails to show that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

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

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is fraught with significant deficiencies, leading to an incomplete and unreliable understanding of the ecological receptors in the West Lewis coastal environment. This region is recognised as a sensitive and biologically active marine system, yet the baseline data provided is insufficient. The methodologies employed fail to adequately capture the presence, behaviour, and habitat use of the species within this ecosystem. As a consequence, the assessment does not furnish a credible evidential basis for evaluating potential impacts.

A critical oversight involves otters, which are classified as a European Protected

Species. The application neglects to appropriately recognise and assess their active utilisation of coastal areas for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential impacts of construction disturbance, noise, and increased activity have not been thoroughly evaluated. Such shortcomings undermine any assertions regarding the absence of significant effects on this species.

Further issues emerge in the evaluation of basking sharks, as the reliance on aerial surveys introduces notable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent use of these waters. The failure to incorporate or adequately consider this data results in a deficient baseline, thereby weakening the reliability of the conclusions presented.

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

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been properly identified or evaluated. The level of uncertainty introduced precludes the exclusion of adverse effects beyond reasonable scientific doubt, invoking the precautionary principle. Under these conditions, it is clear that consent cannot be lawfully granted.

Ultimately, the amalgamation of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These deficiencies impede a thorough evaluation of impacts on marine ecology and protected species, contributing to the overarching conclusion that the application lacks a solid evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

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

A notable inconsistency arises from the developer's assertion of no significant adverse effects alongside the advancement of a Habitats Regulations derogation case, which is applicable only when significant harm is anticipated. This contradiction raises

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline embodies a living cultural landscape where environment, language, tradition, and community are deeply interconnected. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, viewing heritage merely as a series of isolated, static assets, without recognising their ongoing social, cultural, and spiritual significance within the community.

Particularly concerning is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features. This oversight neglects their continued use and meaning, failing to acknowledge the impact of development on their setting. Such mischaracterisation

leads to an incomplete evaluation of cultural effects and disregards the vital role these sites play in community life.

Furthermore, the application overlooks intangible cultural heritage, including the Gaelic language, traditions, and the longstanding relationship between the community and its coastal environment. These elements are central to the area's identity but are entirely absent from the assessment, representing a significant omission. Without factoring in these aspects, the cultural impact of the development cannot be understood.

There are also pressing concerns regarding community rights and engagement. The Gaelic-speaking population possesses a distinct cultural identity, recognised as characteristic of Indigenous Peoples, yet no process of Free, Prior and Informed Consent has taken place. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Compounding these issues is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic impacts on the island community. This omission alone prevents a lawful determination.

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The assessment of social impacts, health, and wellbeing is fundamentally inadequate and lacks the necessary transparency for a lawful evaluation. The developer engaged in a Social Impact Assessment that included focus groups with local residents; however, the complete report has not been made public. This gap in evidence prevents both the public and the competent authority from grasping the full extent of the social risks highlighted by the developer's own research.

Summaries that are available show that residents are experiencing notable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts come from direct engagement and are not based on speculation. The lack of disclosure of the full assessment obstructs proper scrutiny of the findings and diminishes the

capacity to assess their significance in the decision-making process.

Moreover, there is evidence suggesting that the proposal is viewed as a threat to community identity and cohesion, with "cultural loss" noted in the developer's findings. Despite this acknowledgment, these impacts have not been adequately incorporated into the primary application or given the necessary consideration. The failure to release the full Social Impact Assessment obscures the true social and human costs associated with the development.

This absence of transparency compromises the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning are at stake. By withholding the complete dataset, the application fails to provide a comprehensive evidential foundation for assessing the balance of benefits and harms.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must foster positive health outcomes and mitigate harm, yet the evidence currently available suggests there are adverse effects that have not been fully revealed. Without access to the complete assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission is material and represents a failure to meet the evidential standards required by the Environmental Impact Assessment framework.

In summary, the failure to disclose the full Social Impact Assessment, in conjunction with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This hinders a lawful determination and reinforces the conclusion that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding the seascape, landscape, and visual impacts is critically inadequate and fails to capture the true extent of change alongside the sensitivity of the environment. The character of the West Lewis coastline is characterised by an open Atlantic horizon, an undeveloped landscape, and a pronounced sense of remoteness. The proposed large-scale turbines, positioned close to the shoreline, would establish a continuous industrial presence, fundamentally transforming this character and resulting in a permanent alteration to the landscape.

Moreover, the application does not sufficiently portray the magnitude of the anticipated visual change. Given the scale and proximity of the turbines, they would overshadow views from residential areas, historic sites, and popular coastal locations. This development would negatively affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment inadequately communicates

the significance of this impact within the context of such a sensitive landscape.

Methodological issues also arise concerning the selection and presentation of visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately capture the most sensitive receptors or worst-case scenarios, particularly regarding key cultural heritage sites and landscapes of high value. This raises concerns that the magnitude of visual impact has been underestimated, thus compromising the reliability of the assessment.

Furthermore, there is a notable deficiency in the evaluation of the interconnected relationship between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting that is visually and spatially linked to the Atlantic horizon. However, the assessment treats these sites as separate entities rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their context and cultural significance.

The proposed industrialisation of the seascape threatens to sever these connections, altering how heritage assets are perceived and disrupting their relationship with the natural horizon. This represents not merely a visual impact but a wider cultural and spatial detriment that has not been adequately accounted for in the application.

From a policy perspective, the proposal stands in direct conflict with National Planning Framework 4, which aims to protect natural spaces and historic assets. The anticipated scale of change is fundamentally incompatible with the need to preserve landscape character, visual amenity, and the settings of culturally significant locations. The lack of a comprehensive worst-case assessment further undermines claims of compliance with relevant policy.

It is evident that the identified impacts cannot be satisfactorily mitigated. Given the turbines' scale, height, and proximity, their presence would be overwhelmingly dominant and inescapable. The resultant transformation is thus not something that can be moderated to an acceptable level through mitigation efforts.

In summary, the assessment fails to accurately represent the extent of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings inhibit a dependable evaluation and strongly suggest that the proposal is incompatible with the protection of this important landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal for substantial seabed preparation and installation works presents significant concerns, particularly due to the incomplete assessment of construction and pollution risks. The high-energy Atlantic environment along the West Lewis coastline, known for its clean coastal waters and important habitats, is at risk from sediment disturbance and contamination. Although the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it lacks comprehensive

Construction Environmental Management Plans and Pollution Prevention Plans. This absence prevents a thorough evaluation of the adequacy and effectiveness of the proposed mitigation and contingency measures, which are deferred to a post-consent stage.

The reliance on undefined future measures is alarming given the sensitivity of the surrounding environment. There is notable uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty extends to potential repercussions on marine species and habitats identified as sensitive in broader assessments.

Moreover, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent is granted, the application undermines the ability to evaluate whether appropriate safeguards are in place for responding to pollution events. This procedural risk hinders the competent authority's capacity to assess environmental protection measures at the point of determination.

Regulatory requirements stipulate that likely significant effects and necessary mitigation must be assessed before consent is granted. The deferral of essential environmental safeguards directly conflicts with the Environmental Impact Assessment regime. The application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality. Collectively, the absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient, further affirming the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

A critical concern arises from the assumption that fishing activities can be displaced without adverse effects. The application lacks evidence regarding the availability, accessibility, or capacity of alternative fishing grounds to accommodate the additional pressure that displacement would entail. This gap is crucial, as it presents the risk of overfishing in other areas, with potential adverse economic ramifications for the local fishing fleet. In the absence of a detailed and evidence-based assessment, the implications for fisheries and local livelihoods remain unclear.

Moreover, the proposal poses considerable risks to marine species, particularly due to

the underwater noise resulting from construction activities. The high-energy hammer piling anticipated over an extended timeframe is likely to cause disturbances across extensive areas, which would impact species such as dolphins. Concerns regarding the predicted disturbance to a significant proportion of the local bottlenose dolphin population are serious, yet the application minimises the importance of these effects without adequate supporting evidence.

There exists a notable inconsistency within the application, acknowledging the requirement for licences to permit harm to European Protected Species while simultaneously characterising such impacts as negligible. This contradiction calls into question the credibility of the assessment and raises concerns about compliance with the Habitats Regulations, especially where harm is anticipated to necessitate legal authorisation.

Furthermore, the assessment fails to address cumulative impacts stemming from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive analysis of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to establish that the proposed development can coexist with current marine users or avoid significant negative impacts on marine biodiversity, thereby undermining the conclusion that this proposal represents sustainable development.

In summary, the insufficiency of evidence regarding fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies collectively render the assessment incomplete and unreliable. These shortcomings hinder a robust evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a series of significant concerns regarding its treatment of onshore infrastructure, which is assessed in isolation from the offshore components of the project. This fragmented approach obscures the true environmental and socio-economic impacts, as the onshore works, including cabling through protected moorland, the construction of a substation near Stornoway, and the required access infrastructure, are intrinsically linked to the offshore turbines.

A critical element of the onshore infrastructure is the excavation across areas of deep peat, particularly in Barvas Moor, which serves as both an ecologically sensitive habitat and a substantial carbon store. The failure to provide a comprehensive assessment of these impacts limits the understanding of the project's overall environmental footprint, leaving essential questions unanswered.

Moreover, the application does not adequately consider the cumulative effects of

separating the assessments for offshore and onshore components. The Environmental Impact Assessment process mandates that all elements of a project be evaluated collectively. Consequently, the separation prevents a thorough understanding of the combined impacts on peatlands, habitats, and local communities.

Sensitive habitats, including machair systems and peatland environments, are at risk, and the application falls short in demonstrating that these impacts have been fully assessed or that necessary avoidance measures are in place. This oversight highlights a significant gap in the evidence required for biodiversity protection. Additionally, the disturbance of peatland raises concerns about carbon balance, as released stored carbon could create a carbon debt, undermining the aims of renewable energy initiatives.

There are also serious implications for land use, particularly with the routing of infrastructure through active croft land. The application lacks evidence that it has obtained the necessary consents or initiated appropriate processes, which raises questions about the feasibility and legality of the project.

From a policy standpoint, the failure to evaluate the project as an integrated whole, coupled with the inadequate protection of peatlands, habitats, and land use rights, conflicts with the National Marine Plan and National Planning Framework 4. The inability to demonstrate effective avoidance or mitigation strategies further weakens the application.

In summary, the lack of comprehensive assessment and the separation of project components, along with insufficient evidence regarding environmental and land use impacts, renders this part of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The 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.

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm embodies a significant failure to meet the criteria for sustainable development as outlined by statutory duties, national policy, and evidential standards. It echoes the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was a key concern. This current proposal is now presented under a policy framework that should place even greater emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are considerable gaps in the baseline data provided, alongside the use of an undefined design envelope and reliance on unspecified mitigation measures. Important impact pathways have been omitted, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment is deficient and does not allow for a comprehensive understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands

(Scotland) Act 2018, while the failure to provide a complete Social Impact Assessment constitutes a significant omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

In terms of compliance with National Planning Framework 4, the proposal is fundamentally at odds with requirements. It does not adequately protect biodiversity, natural places, or cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. Furthermore, the cumulative impacts of both offshore and onshore components have not been sufficiently assessed, leading to obscured effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties remain around environmental risks, which could be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and hindering a lawful determination that impacts are acceptable.

This proposal would result in extensive and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, loss of dark skies, disruption of cultural and visual relationships, and negative impacts on tourism are permanent effects that cannot be mitigated adequately.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, combined with conflicts with policy and unresolved environmental risks, inhibit a lawful, evidence-based decision. The competent authority is urged to refuse consent for this application or to invoke relevant regulatory provisions to compel the submission of the necessary information.

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

Additional Comments

It is fundamentally and deeply wrong to impose such a huge scale industrial development on our fragile and unique environment and culture.

The scale of the development is unprecedented and its environmental impact will be huge. Granted it will be producing “green” energy, but at what cost? And to whom? Consultation with local stakeholders before planning permission was granted was utterly inadequate, and the opinions of Islanders are once again disregarded and ignored. It should be for local people to have the final decision on a project of this scale and it should not be forced upon us by the Government and large energy companies.

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: 81902E76

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 marine licensing and Environmental Impact Assessment regimes. The review of the Environmental Impact Assessment Report and its supporting documentation has revealed material deficiencies in planning, environmental considerations, cultural impacts, and procedural compliance. The development site, located off the west side of the Isle of Lewis, is characterised by an Atlantic-facing coastline, a near-pristine environment, and a rich cultural identity. The scale and proximity of the proposed turbines, along with the design, raise serious concerns about compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide a robust evidential basis for a lawful determination. Key environmental data is absent, baseline information is inadequate and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework employed limits the understanding of likely significant effects, and the reliance on unspecified mitigation measures renders it impossible to assess their effectiveness. Consequently, the documentation fails to offer a full or informed understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects, which lack solid evidence.

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a complete, transparent, or dependable analysis of the potential environmental consequences of the proposal. The adoption of a flexible Project Design Envelope, lacking firm commitments to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This ambiguity undermines the assessment's integrity and means that the impacts outlined may not accurately reflect the actual development, hindering both public understanding and the competent authority's ability to gauge the true environmental effects.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent on the premise that environmental harm will be rectified at a future date obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This postponement of critical information to post-consent stages is procedurally improper and contradicts the intentions of the Environmental Impact Assessment framework, which mandates that significant effects and mitigation must be clearly defined prior to any decision-making.

Significant evidential shortcomings are present, including gaps in baseline data, methodological limitations, and reliance on assumptions in lieu of site-specific evidence. This leads to uncertainty concerning the magnitude and significance of impacts, especially where negligible or non-significant effects are asserted without robust supporting data. A lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not meet the evidential threshold necessary under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate alignment with National Planning Framework 4, including provisions regarding biodiversity protection and environmental integrity, as it is unclear whether impacts have been comprehensively assessed or if adequate safeguards are in place.

Overall, the reliance on an undefined design envelope, the absence of defined mitigation strategies, and the shortcomings in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These issues obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make a determination based on the information submitted.

ASSESSMENT OF ALTERNATIVES

The assessment of alternatives in the application is fundamentally insufficient, failing to adhere to the statutory requirements of the Environmental Impact Assessment regime. It does not provide a structured and reasoned comparison of realistic alternatives based on environmental impacts; instead, it offers a narrative of the project's development. This approach does not adequately show that the developer has

identified, assessed, and selected less harmful options over more damaging solutions.

There is an evident 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 seriously considered the possibility of placing turbines further offshore, where it is likely that visual, ecological, and coastal impacts could be minimised. Considering the sensitivity of the West Lewis coastline and the critical role that proximity to shore plays in determining impact, the absence of such analysis raises significant concerns about the siting decision's potential to be the least damaging option.

Further deficiencies are present in the cable routing and landfall assessment, as there is inadequate evidence showing that alternative routes have been thoroughly investigated to avoid or reduce impacts on sensitive receptors, including areas of cultural and spiritual significance such as Barvas Cemetery. The lack of a clear avoidance strategy and a comparative analysis suggests that mitigation through design has not been implemented, relying instead on measures that would come into effect post-design.

Consequently, the application fails to establish that environmental harm has been minimised through careful site selection, layout, and infrastructure routing. This situation indicates a failure to adhere to the established mitigation hierarchy, which in turn hampers the competent authority's ability to evaluate whether less harmful and more suitable alternatives are available. Without a thorough assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution within policy frameworks.

From a policy standpoint, this inadequacy compromises compliance with National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission that contributes to the overarching conclusion that the application has not been sufficiently evaluated and is not capable of supporting a lawful decision.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species related to the West Lewis coastal environment is insufficient, lacking a complete understanding of the ecological receptors in this biologically active marine system. The baseline data presented is incomplete, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of various species. Consequently, the assessment fails to offer a reliable evidential basis for evaluating potential impacts.

A notable shortfall in the assessment is its treatment of otters, which are classified as a European Protected Species. The application does not adequately recognise or assess otters' active use of coastal areas for foraging and movement. Without consideration of their core foraging range and behavioural patterns, the assessment overlooks the

potential impacts of construction-related disturbance, noise, and increased activity, thereby undermining the conclusions drawn about the absence of significant effects on this species.

Additionally, there are significant deficiencies in the assessment of basking sharks. The reliance on aerial surveys leads to 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 indicate a frequent presence in these waters. The failure to properly incorporate such critical data results in an incomplete baseline, which in turn diminishes the reliability of the conclusions reached.

These methodological shortcomings mean that the conclusions asserting negligible or non-significant effects are based more on assumptions than on robust evidence. The lack of adequate baseline data further hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty obscures the true scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not comply with the Environmental Impact Assessment regime or the requirements set out in National Planning Framework 4, as the proper identification and assessment of protected species are lacking. The uncertainty generated by these deficiencies prevents any conclusion about adverse effects being made beyond reasonable scientific doubt, necessitating the application of the precautionary principle. In light of these issues, it is clear that consent cannot be granted lawfully.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions leads to an unreliable assessment. These significant deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, ultimately indicating that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the evidential threshold required to conclude that there will be no adverse effect on the integrity of protected sites. Significant gaps in evidence and internal inconsistencies within the ornithological assessment undermine its conclusions. There is a fundamental contradiction in the application, as the developer asserts no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case, which is only necessary where significant harm is anticipated. This inconsistency casts doubt on the reliability of the assessment and suggests that its conclusions are unsupported by the evidence presented.

Furthermore, the assessment does not provide sufficient evidence that seabirds associated with protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. The importance of these feeding grounds is not fully considered, and the

reliance on modelling approaches introduces uncertainty, particularly for species that are already in severe decline, such as Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, especially in instances where baseline data is incomplete and behavioural responses are not entirely understood.

The siting of turbines within a recognised migratory corridor introduces a significant risk by effectively creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The assessment does not adequately evaluate the long-term implications of sustained mortality within this corridor or the potential effects on species with small global populations.

From a regulatory perspective, the presence of contradictory conclusions, data gaps, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle and obstructs a lawful conclusion in favour of consent. The deficiencies identified 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 in direct conflict with national policy.

Overall, the assessment is rendered unreliable due to internal inconsistencies, methodological weaknesses, and a lack of sufficient evidence. These shortcomings prevent a thorough evaluation of impacts and contribute to the conclusion that the application does not meet the statutory requirements necessary for a proper determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity is severely lacking, as it fails to acknowledge the West Lewis coastline as a vibrant cultural landscape where the environment, language, tradition, and community are interconnected. The application adopts a simplistic viewpoint, perceiving heritage merely as a collection of static, isolated assets without recognising their ongoing social, cultural, and spiritual relevance within the community.

Significant shortcomings are evident in how culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are treated. These sites serve as active burial places and centres of spiritual practice, yet they are erroneously classified as static features. This oversight neglects their current use, significance, and the potential impact of development on their surroundings. Such mischaracterisation leads to an incomplete assessment of cultural effects, disregarding their importance within community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are fundamental to the area's identity but are entirely omitted from the evaluation, leading to a substantial gap in understanding the

cultural ramifications of the development.

Concerns are further compounded by issues relating to community rights and participation. The Gaelic-speaking population embodies a distinct cultural identity with attributes recognised as characteristic of Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that impact cultural and environmental interests.

Additionally, a crucial procedural error is the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot meet its legal obligation to appraise the social, cultural, and economic impacts on the island community. This omission alone obstructs a lawful decision-making process.

From a policy standpoint, these shortcomings place the proposal in direct opposition to National Planning Framework 4, especially regarding the safeguarding of historic assets and locations. The neglect to consider both tangible and intangible heritage, alongside failing to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

In summary, the inadequacies in assessing living heritage, intangible cultural significance, community rights, and statutory requirements culminate in a substantial evidential void. The cultural impacts of the development have not been adequately evaluated, and the application fails to offer a robust foundation for gauging the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's Social Impact Assessment, which included focus groups with local residents, has not been fully published. This lack of transparency creates a significant evidential gap, hindering both public understanding and the competent authority's ability to evaluate the social risks identified by the developer.

Summaries suggest that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts are grounded in direct community engagement, not speculation. However, without access to the complete assessment, proper scrutiny of the findings is not possible, which limits the assessment of their significance in the decision-making process.

Additionally, there is evidence that the proposal threatens community identity and cohesion, with "cultural loss" highlighted in the developer's findings. Despite this, the impacts have not been adequately included in the main application or given the necessary weight. 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 social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and function could be affected. By not providing the complete dataset, the application lacks a solid evidential basis to weigh the benefits against potential harms.

From a policy standpoint, the application does not demonstrate alignment with National Planning Framework 4 regarding health and wellbeing. Developments should foster positive health outcomes and avoid harm, yet existing adverse effects indicated by available evidence have not been fully disclosed. Consequently, without the full assessment, compliance with this policy remains unproven.

The procedural ramifications are significant. The competent authority cannot conduct a comprehensive socio-economic and health evaluation without the complete Social Impact Assessment. This represents a material omission in the application and a 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, alongside evidence of existing negative impacts, renders the assessment incomplete and unreliable. This hinders a lawful determination and underlines the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation concerning seascape, landscape, and visual impacts is significantly inadequate and does not appropriately reflect the extent of change or the sensitivity of the affected environment. The character of the West Lewis coastline is marked by an open Atlantic horizon, an undeveloped landscape, and a pronounced sense of remoteness. The proposed installation of large-scale turbines near the shoreline would establish a continuous industrial presence that would fundamentally disrupt this character, leading to a permanent and irreversible alteration of the landscape.

Methodological issues arise regarding the choice and depiction of visual viewpoints, with evidence indicating that these viewpoints may not comprehensively represent the most sensitive receptors or the most severe scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This raises concerns that the projected visual impact might be understated, thereby compromising the assessment's reliability.

Moreover, the application fails to evaluate the interconnectedness of landscape, seascape, and cultural heritage adequately. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are part of an overarching landscape setting linked by both visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated entities, neglecting their interdependence, which results in a deficient appraisal of the impacts on their setting and cultural importance.

The potential industrialisation of the seascape would disrupt these relationships, modifying the context in which heritage assets are perceived and severing their connection to the natural horizon. This constitutes not merely 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 directly contradicts National Planning Framework 4 regarding the safeguarding of natural environments and historic assets. The scale of transformation is inconsistent with the obligation to preserve landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment weakens any assertion of policy compliance.

It is evident that the identified impacts are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be dominant and inescapable. Consequently, the resultant change is fundamental and permanent, rendering any attempts at mitigation insufficient to achieve an acceptable level of impact.

In summary, the assessment fails to accurately depict the magnitude of impact, the sensitivity of the environment, and the interconnected dynamics of landscape and heritage. These shortcomings hinder a reliable evaluation and strongly support the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises serious concerns due to its incomplete assessment of construction and pollution risks, which lack the necessary detail to evaluate potential environmental effects. It involves significant seabed preparation and installation works within a dynamic Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that are to be established after consent, which hampers any meaningful evaluation of their effectiveness or adequacy.

This uncertainty is particularly alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats, both of which are susceptible to sediment disturbance and contamination. Although the application acknowledges the risks associated with sediment mobilization and the possibility of accidental chemical or oil spills, it lacks sufficient detail on prevention, control, or monitoring strategies.

Moreover, there is ambiguity surrounding the scale and behaviour of sediment plumes resulting from the seabed disturbance and cable installation. Without comprehensive modelling and clearly articulated management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these impacts. This uncertainty also extends to the potential effects on already identified sensitive marine species and habitats within the broader assessment.

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

From a regulatory standpoint, the postponement of vital environmental safeguards is at odds with the stipulations of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are evaluated prior to granting consent. When critical information is absent, a lawful determination cannot be achieved. Furthermore, the application fails to prove compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, a lack of detailed management plans, and the uncertainty surrounding potential impacts renders the assessment significantly deficient. These shortcomings hinder a thorough evaluation of construction and pollution risks, reinforcing the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning lack of evidence regarding the potential displacement of fishing activity. It assumes that such displacement can occur without negative consequences, yet it fails to establish whether alternative fishing grounds are available, accessible, or capable of accommodating the increased pressure. This oversight is critical, as the risk of overfishing in other areas poses a threat not only to marine life but also to the economic stability of the local fishing fleet. The implications for fisheries and livelihoods remain inadequately addressed, leaving serious questions about the long-term sustainability of these practices.

Moreover, the risks posed to marine species, particularly from underwater noise during construction, are alarmingly understated. The use of high-energy hammer piling is anticipated to generate disturbances over considerable distances, which may adversely affect species such as dolphins. The anticipated impact on a significant portion of the local bottlenose dolphin population raises profound concerns, yet the application minimizes these effects without providing compelling supporting evidence.

There is a notable inconsistency within the application itself, where it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction not only undermines the credibility of the assessment but also raises significant doubts about compliance with the Habitats Regulations, particularly in scenarios where anticipated harm would necessitate legal authorisation.

Additionally, the assessment does not adequately address the cumulative impacts

arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these interconnected effects, it is impossible to gauge the overall impact on marine ecosystems and socio-economic conditions effectively.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not provide sufficient evidence that the development can coexist harmoniously with current marine users or that it can avert unacceptable impacts on marine biodiversity, which are essential for concluding that the proposal aligns with the principles of sustainable development.

In summary, the glaring deficiencies regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions within the application render the assessment both incomplete and unreliable. These issues critically hinder any reliable evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is not complete and does not adequately consider the impacts of this integrated project. The offshore turbines and the onshore works are interconnected, yet they are evaluated separately, leading to a disjointed approach that hides the true scale of environmental and socio-economic effects.

Onshore elements include cabling through protected moorland, a substation near Stornoway, and access infrastructure through sensitive landscapes. These constructions involve excavating deep peat areas, particularly in Barvas Moor, which is crucial for carbon storage and is an ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a full understanding of the project's overall environmental footprint.

By omitting or delaying the assessment of onshore impacts, the application obstructs the proper evaluation of cumulative effects. The Environmental Impact Assessment process requires all components of a project to be evaluated together, but the division between offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities are not fully appreciated.

There are notable risks to sensitive habitats, including machair systems and peatland areas that have policy protection. The application does not prove that the impacts on these habitats have been properly assessed or that suitable avoidance measures have been implemented. This creates a significant gap in evidence regarding biodiversity protection.

The proposal also raises issues related to carbon balance. Disturbing peatland releases stored carbon, which could lead to a carbon debt, contradicting renewable energy goals. The application does not sufficiently address this concern or show that the overall carbon balance is beneficial.

Furthermore, routing infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application fails to provide evidence that necessary consents or processes have been started, which raises doubts about its deliverability and lawful execution.

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment does not include an assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline is known for its exceptionally dark skies, which contribute to environmental quality, cultural identity, and tourism. The proposal introduces permanent red aviation lighting that will be visible from long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This will fundamentally change the night-time environment.

There is no evaluation of the lighting's impact on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important because dark skies are crucial to the area's identity and are becoming increasingly relevant to tourism sectors like astro-tourism. The lack of consideration for these impacts represents a clear gap in the environmental and landscape assessment.

Moreover, the application fails to assess the effects of lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting, which can lead to disorientation and a higher 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 risk of increased mortality remain unexamined.

The reliance on daytime survey data within the ornithological assessment is a further issue, as it does not account for nocturnal activity or associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, but this has not been evaluated. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts.

Without assessing nocturnal effects, it is impossible to determine if protected species or designated sites will be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved. This

engages the precautionary principle and hinders a lawful determination.

From a policy perspective, the absence of this assessment conflicts with National Planning Framework 4 regarding the protection of natural places and environmental quality. It also affects the overall evaluation of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the standards of sustainable development as required by statutory duties, national policy, and evidential standards. This proposal mirrors the core issues of the 2008 Lewis Wind Power application, where the level of industrialisation was deemed unacceptable. Notably, it is now being advanced under a policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing.

A critical examination reveals that the application does not present a comprehensive or reliable evidential basis for evaluation. There are significant gaps in baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures further complicates the assessment. Key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects. As such, the Environmental Impact Assessment is incomplete, failing to provide clarity on likely significant effects or residual impacts.

Procedural deficiencies are evident, particularly the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of duty under the Islands (Scotland) Act 2018. Additionally, the failure to disclose a full Social Impact Assessment represents a material omission, hindering the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience. These shortcomings render the application unfit for determination.

Moreover, the proposal contravenes National Planning Framework 4. It does not adequately safeguard biodiversity, natural places, and cultural heritage. The evidence provided does not support that health and wellbeing impacts are acceptable, nor does it demonstrate 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 potential impacts on peatlands, carbon balance, habitats, and crofting land.

The environmental risks associated with this proposal remain uncertain and may be significant. Assessments concerning marine ecology, seabirds, protected species, and

marine mammals are incomplete and contain inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion on the acceptability of impacts.

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

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

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

Additional Comments

Every person and the wildlife living on the isle of Lewis will be effected by this offshore windfarm in one way or another.

The damage to the shorebed will disturb both marine life. Whilst the infrastructure will damage SSI.

Lewis's single track roads cannot accomodate the machinery required to build the necessary accompanying structures. This will block up roads for years, impacting tourism.

The main tourist sites on the island are on the west side, it's busy enough as it is during the summer without this additional hazard.

Extra traffic will impact the emergency services. The West Side has one of the largest single elderly population on the island, who may require urgent admission to hospital at any time. This propal puts those lives at risk.

Light pollution will put into question our dark skies status and impact migratatory birds. We are already noticing an impact on the wildlife, generated by new SSE work.

Finally, house prices will drop, the island ecomony cannot sustain this. With other options available such as wave power or even relocating this wind farm further off shore would make a huge difference.

Just because Scottish Government has decided on net zero, this shouldnt be to the

detriment of island residents. It needs a plan that takes into account the day to day lives of the residents, not just looking on maps and joining the dots.

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: C5BA1053

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

Dear Sir/Madam

This representation serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area noted for its Atlantic-facing coastline, near-pristine environment, and robust cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal in relation to its compatibility with statutory requirements, national policy, and the principles of sustainable development.

An adequate evidential basis for a lawful determination is notably lacking in the application. There is a deficiency in critical environmental data, with baseline information being both limited and inconsistent, while key elements of the proposal are not adequately defined. The flexible design framework employed inhibits a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures prevents an assessment of their potential effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack robust supporting evidence.

The proposal exhibits clear and substantive conflicts with established policy. 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. There is insufficient demonstration that the national requirements for the protection of biodiversity, climate interests, and environmental integrity can be satisfied. These conflicts directly impact the statutory tests required for consent and compromise the capacity of the competent authority to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal raises significant concerns, particularly with large turbines positioned in close proximity to the shoreline, thereby impacting landscape capacity, visual dominance, and environmental consequences. Collectively, the lack of sufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and incapable of supporting a lawful determination. In light of these issues, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally lacking and does not deliver a comprehensive, transparent, or dependable evaluation of the potential environmental effects associated with the proposal. The employment of a flexible

Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This uncertainty hinders the consistent application of a worst-case scenario, which compromises the integrity of the assessment. As a result, the impacts outlined may not accurately reflect the development that will ultimately be constructed, leaving both the public and the competent authority unable to grasp the true extent of the environmental consequences.

The application places considerable reliance on mitigation measures, monitoring strategies, and management plans that have yet to be clearly defined. Consequently, consent is sought on the premise that any environmental harm will be addressed at a later date. This postponement of crucial information to post-consent stages is procedurally unacceptable and contradicts the core objectives of the Environmental Impact Assessment regime, which necessitates that likely significant effects and mitigation strategies are clearly established before any determination.

There are also substantial evidential shortcomings, which include gaps in baseline data, methodological limitations, and a dependency on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly where conclusions asserting negligible or non-significant effects are presented without robust supporting data. The lack of adequate information inhibits a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot be reconciled with statutory requirements.

As a result, the application does not meet the evidential standards required under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, which includes obligations related to 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 reliance on an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority without the necessary information to make an informed determination on the application.

ASSESSMENT OF ALTERNATIVES

The evaluation of alternatives in the application is fundamentally inadequate and fails to satisfy the statutory requirements mandated by the Environmental Impact Assessment regime. Instead of offering a structured and reasoned comparison of viable alternatives based on their environmental impacts, the submission provides merely a narrative of the project's development. This methodology does not demonstrate that less harmful options have been sufficiently identified, assessed, and selected over

more damaging alternatives.

A clear and evidence-driven comparison of different offshore locations, varying development scales, or design configurations is absent. Notably, the application does not prove that the developer has genuinely considered placing turbines further offshore, which would likely lessen visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline and the critical nature of proximity to shore in assessing impact, the lack of such an analysis precludes any conclusion that the proposed siting is the least damaging option.

These inadequacies also extend to the assessment of cable routing and landfall, where there is insufficient documentation that alternative routes have been adequately examined to avoid or mitigate effects on sensitive receptors. This includes significant areas of cultural and spiritual importance, such as Barvas Cemetery. The failure to establish a clear avoidance strategy and the absence of comparative analysis suggest that there has been no application of mitigation by design, instead relying heavily on measures to mitigate post-design.

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

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially concerning the protection of natural environments, cultural heritage, and community wellbeing. The absence of a systematic and comparative assessment is a significant shortcoming that contributes to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed and fails to deliver a comprehensive understanding of the ecological receptors in this sensitive marine area. This system is biologically vibrant, yet the baseline data remains inadequate, and the methodologies used are insufficient for accurately capturing species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential foundation for evaluating potential impacts.

A significant oversight pertains to otters, classified as a European Protected Species. The application neglects to adequately acknowledge and assess their active utilisation of coastal regions for foraging and movement. This omission in evaluating their core foraging range and behavioural patterns results in an incomplete understanding of how

construction disturbance, noise, and increased activity might affect them. This gap undermines any assertions regarding the absence of significant effects on this species.

Further issues emerge in the assessment of basking sharks, where dependence on aerial surveys introduces substantial detection bias, particularly under Atlantic conditions. Such an approach likely leads to an underestimation of their presence, especially when juxtaposed with established land-based observations that indicate frequent use of these waters. The failure to integrate or appropriately consider this data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that conclusions regarding negligible or non-significant effects rest on assumptions rather than solid evidence. Furthermore, the lack of sufficient baseline data inhibits a meaningful examination of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This introduces uncertainty about the actual level of risk faced by marine species and habitats.

From a regulatory standpoint, the application does not align with the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been accurately identified or assessed. The uncertainty generated prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. In light of these concerns, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment presented in the application is flawed and inconsistent, raising serious concerns about its reliability. The west coast of the Isle of Lewis is home to internationally important seabird populations that are already in decline. However, the application does not provide the required evidence to show that these species will not be adversely affected by the development. The proposed location falls within key foraging areas and migratory pathways, yet the assessment does not adequately address the risks of displacement, collision, or habitat loss.

There is a significant contradiction within the application, as the developer asserts no significant adverse effects while also advancing a Habitats Regulations derogation case. This case is only needed when significant harm is anticipated, casting doubt on the credibility of the assessment and suggesting that its conclusions lack proper support from the evidence. Additionally, the assessment fails to demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will not be impacted. It does not fully consider the significance of these feeding grounds, and the

reliance on modelling introduces uncertainty, especially for species like Kittiwakes and Fulmars that are in serious decline. The methodologies used are likely to underestimate mortality, particularly where the baseline data is incomplete and the behavioural responses of the species are not fully understood.

The positioning of turbines within a recognised migratory corridor creates significant risks, forming a barrier in a primary flight path for species travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term consequences of ongoing mortality in this corridor or the potential effects on species with smaller global populations.

From a regulatory standpoint, the application does not meet the evidential threshold to confirm 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, preventing a lawful conclusion in favour of consent.

The identified deficiencies also indicate non-compliance with the National Planning Framework 4 regarding biodiversity protection and safeguarding of natural assets. The failure to prove that internationally important seabird populations will remain unaffected directly conflicts with national policy.

Overall, the assessment's internal inconsistencies, methodological weaknesses, and lack of sufficient evidence render it unreliable. 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, failing to recognise the West Lewis coastline as a living cultural landscape where the environment, language, tradition, and community are interconnected. The application takes a reductive approach by treating heritage merely as a collection of isolated, static assets, disregarding their ongoing social, cultural, and spiritual significance within the community.

A critical shortcoming is the treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These locations are active burial and spiritual sites; however, they are mischaracterised as static features. This oversight neglects their continued use and meaning, as well as the potential impact of development on their surroundings. The result is an incomplete evaluation of cultural effects, overlooking their vital role in community life.

Additionally, the assessment fails to consider intangible cultural heritage elements, including the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are crucial to the area's

identity, yet they are entirely omitted from the assessment, representing a significant gap. Without addressing these factors, it is impossible to fully understand the cultural impact of the development.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population possesses a unique cultural identity with characteristics recognised in Indigenous Peoples, yet there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the legitimacy of the assessment and fails to align with established principles of participation in matters affecting cultural and environmental interests.

Another procedural failure is the absence of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The competent authority is unable to fulfil its legal obligation to assess the social, cultural, and economic impacts on the island community without this assessment, preventing a lawful determination.

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment regarding seascape, landscape, and visual impacts is insufficient and does not capture the extent of change or the sensitivity of the surrounding environment. The coastline of West Lewis features an open Atlantic horizon, an undeveloped character, and a notable sense of remoteness. The close placement of large-scale turbines to the shoreline would introduce a continuous industrial presence, fundamentally changing this character and resulting in an irreversible transformation of the landscape.

The application fails to accurately depict the magnitude of visual change that would occur. Due to the scale and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations. This would negatively affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not sufficiently convey the significance of this impact within the context of such a delicate landscape.

Concerns also arise regarding the choice and presentation of visual viewpoints.

Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important 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.

Moreover, there is a lack of evaluation of the interconnectedness of landscape, seascape, and cultural heritage. Important sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape context linked by visual and spatial relationships to the Atlantic horizon. The assessment treats these heritage assets as isolated, failing to acknowledge their interdependence, which leads to an incomplete understanding of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, affecting how heritage assets are perceived and their connection to the natural horizon. This not only represents a visual impact but also a broader cultural and spatial harm that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4 regarding the preservation of natural places and historic assets. The scale of change contradicts the need to maintain landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further weakens any assertion of policy compliance.

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

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

CONSTRUCTION AND POLLUTION RISKS

The absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty surrounding potential impacts render the assessment materially deficient. This deficiency obstructs a robust evaluation of construction and pollution risks and underscores the conclusion that the application is incomplete.

The proposal involves considerable seabed preparation and installation works in a high-energy Atlantic environment. However, there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. Instead, the application leans on mitigation and contingency measures that would be created after consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is particularly troubling given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and significant habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to detail how these risks will be prevented, controlled, or monitored.

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

Additionally, the lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application precludes an evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed before consent; when such information is absent, a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements relating to environmental protection and water quality.

FISHERIES AND MARINE LIFE

The assessment of marine life and fisheries associated with the application is inadequate, failing to offer a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast host a rich marine ecosystem alongside an active fishing industry. However, the application does not adequately demonstrate how these habitats and uses will be protected or maintained without significant disruption.

A notable concern arises from the assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence to support the availability or accessibility of alternative fishing grounds that could sustain additional pressure. This gap is critical, as such displacement may lead to overfishing in other areas and could have broader economic implications for the local fishing fleet. The absence of a clear, evidence-based assessment means that the effects on fisheries and livelihoods remain poorly understood.

Furthermore, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction activities. The anticipated high-

energy hammer piling over an extended duration is likely to disturb marine life over considerable distances, which may adversely affect species, including dolphins. The predicted disturbance to a significant portion of the local bottlenose dolphin population is concerning; nevertheless, the application tends to underestimate the significance of these effects and lacks adequate supporting evidence.

There exists a contradiction within the application regarding the necessity of licences for harming European Protected Species, while impacts are concurrently described as negligible. This inconsistency undermines the assessment's credibility and raises serious questions about compliance with the Habitats Regulations, especially where harm is expected to a degree that necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 and the National Marine Plan. It does not adequately show that the development can coexist with existing marine users or that it can avoid unacceptable impacts on marine biodiversity, thus hindering the determination of whether the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal raises significant concerns regarding carbon balance. Disturbance of peatland areas releases stored carbon, which could create a carbon debt that undermines the aims of renewable energy development. The application fails to adequately tackle this issue or prove that the overall carbon balance remains positive.

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

The assessment of onshore infrastructure is materially incomplete, neglecting the full extent of impacts stemming from what constitutes a single integrated project. The offshore turbines and onshore works are intrinsically linked but are evaluated separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects. The onshore components include cabling across protected moorland, construction of a substation near Stornoway, and associated access infrastructure through sensitive landscapes. These works involve

excavation across areas of deep peat, particularly within Barvas Moor, which is a critical carbon store and ecologically sensitive habitat. The application does not deliver a thorough assessment of these impacts, thus preventing a complete understanding of the project's overall environmental footprint.

By excluding or deferring the assessment of onshore impacts, the application obstructs proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all elements of a project are considered collectively, yet the separation of offshore and onshore components means that the combined impacts on peatlands, habitats, and communities are not fully grasped.

There are notable risks to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not show that impacts on these habitats have been thoroughly assessed or that appropriate avoidance measures have been implemented. This signifies a clear evidential gap in the context of biodiversity protection.

From a policy standpoint, the failure to assess the project as a whole and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further diminishes the reliability of the application. Collectively, the separation of project components, the lack of comprehensive assessment, and the absence of evidence regarding environmental and land use impacts make this aspect of the application incomplete and unreliable, hindering a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of assessments 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 crucial for the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting that can be seen over long distances would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment.

The proposal fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This is particularly concerning given the vital role that dark skies play in the area's identity and the growth of emerging tourism sectors such as astro-tourism. The lack of consideration for these impacts creates a clear gap in the overall landscape and environmental assessment.

Moreover, there is no analysis of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to phototaxis, which can lead to disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, failing to address how aviation lighting may affect these species or

contribute to increased mortality rates.

This issue is exacerbated by the reliance on daytime survey data for the ornithological assessment, which does not adequately capture nocturnal activity or related risks. Other species, such as Kittiwakes, that 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 hinders the understanding of ecological impacts.

Without an evaluation of nocturnal impacts, it is impossible to determine if protected species or designated sites would be adversely affected. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt cannot be met, thereby invoking the precautionary principle and preventing a lawful determination.

From a policy standpoint, these omissions contradict the National Planning Framework 4 regarding the protection of natural spaces and environmental quality. They also weaken the broader assessment of landscape and seascape impacts since the character of night-time forms an essential element of the environment.

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

TOURISM

The application neglects to properly assess the impacts on tourism, which is a vital component of the Isle of Lewis economy, and it fails to evaluate the economic and social consequences for this key sector. Tourism relies heavily on the island's wild coastline, nearly untouched landscapes, dark skies, and the sense of remoteness that attracts visitors. While the application states that 86% of tourists are drawn to the scenery, it does not provide a quantified analysis of how large-scale offshore infrastructure could influence visitor numbers, behaviour, or their overall economic contribution.

Tourism has seen significant growth, with its value rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and contributing up to 16% of the island's economy. However, the application fails to model the potential impacts of industrialising the seascape and the resulting loss of environmental quality on Tourism Gross Value Added or the wider economic resilience of the area. Without this critical analysis, it remains unclear whether the proposed development would yield a net economic benefit or negatively affect an established and expanding sector.

Furthermore, the assessment overlooks the importance of environmental quality to tourism, including the essential role of unspoiled landscapes and dark skies in enhancing visitor experiences and emerging markets such as nature-based tourism and astro-tourism. The absence of a Dark Skies Assessment further exacerbates this shortfall, creating a significant gap in understanding the potential impacts on a growing

segment of the local economy.

In an island community that faces challenges regarding economic diversification, the failure to evaluate tourism impacts has broader implications for employment, local businesses, and the sustainability of communities. The lack of a compliant Island Communities Impact Assessment indicates that these economic vulnerabilities have not been sufficiently examined, contrary to the requirements outlined in the Islands (Scotland) Act 2018.

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

Overall, the lack of quantification of tourism impacts, the failure to assess the environmental factors that influence visitor behaviour, and the disregard for the economic dependency of the island culminate in a substantial evidential gap. This inhibits a thorough evaluation of economic effects and reinforces 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

I object to this development on the grounds of its highly destructive nature. This development will ruin the environment and do nothing to improve the provision of base load power.

Scotland and its seas should not be ruined for the provision of a power generation system that destroys so many aspects of the environment and of the things that make it as ecologically important as it is.

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: B71E6A9D

