

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The basis of this objection arises from a review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural integrity. The site is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns are raised about the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application lacks a sufficient evidential foundation necessary for a lawful determination. Essential environmental data is absent, and the baseline information presented is both limited and inconsistent, with critical components of the proposal remaining undefined. The flexible design framework employed hinders a clear assessment of significant effects, while the reliance on unspecified mitigation measures prevents any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the potential environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

There exist significant policy conflicts, as the proposal seems misaligned with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and weaken the capacity of the competent authority to determine that the development meets policy acceptance.

Moreover, the magnitude of the proposal is unprecedented in this area, with large turbines positioned perilously close to the shoreline, raising serious issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicates that the application is incomplete and unfit for a lawful determination. Under these conditions, it is imperative that the precautionary principle is invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

The assessment of basking sharks also shows significant flaws. The reliance on aerial surveys creates a notable detection bias, particularly in Atlantic conditions, likely leading to an underestimation of their presence. This is especially evident when compared to established land-based observations that indicate these waters are frequently used by basking sharks. By not incorporating or properly considering this data, the assessment presents an incomplete baseline and diminishes the reliability of its conclusions.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

ongoing social, cultural, and spiritual significance within the community.

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

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

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

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

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

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The current proposal exhibits significant deficiencies in its assessment of social impacts, health, and wellbeing, lacking the necessary transparency for a lawful evaluation. Although the developer has conducted a Social Impact Assessment, which

included focus groups with local residents, the complete report remains unpublished. This creates a substantial evidential gap, hindering both public understanding and the competent authority's ability to assess the full extent of social risks identified through the developer's research.

Preliminary summaries indicate that local residents are experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposed development. These reported impacts stem from direct engagement and are factual, not speculative. However, the lack of disclosure regarding the full assessment limits scrutiny of these findings and obstructs a thorough evaluation of their significance in the decision-making process.

Furthermore, the proposal is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted within the developer's findings. Yet, these impacts have not been adequately incorporated into the main application or given the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true human and social costs of the development.

This lack of transparency also undermines the Environmental Impact Assessment process. To ensure a comprehensive understanding of the social, economic, and health impacts of such developments, especially when community character may be affected, the full dataset is essential. Without it, the application fails to provide a complete evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 concerning health and wellbeing. Developments must promote positive health outcomes and avoid causing harm; however, the existing evidence suggests adverse effects that have not been fully revealed. Consequently, without the complete assessment, the ability to demonstrate compliance with this policy is compromised.

The procedural ramifications are considerable. The competent authority cannot conduct a thorough socio-economic and health evaluation without access to the complete Social Impact Assessment. This represents a crucial omission within the application and a failure to satisfy the evidential requirements set forth by the Environmental Impact Assessment regime.

In summary, the failure to disclose the full Social Impact Assessment, coupled with evidence of existing negative impacts, results in an incomplete and unreliable assessment. This limitation prevents a lawful determination and reinforces the assertion that the application is lacking sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline raises serious concerns about the assessment of seascape, landscape, and visual impacts. The coastline is characterised by an open Atlantic horizon, an undeveloped nature, and a

strong sense of remoteness. The introduction of these turbines would create a dominant industrial presence, fundamentally changing the landscape and leading to a permanent transformation.

The assessment of visual change is insufficient. The scale and closeness of the turbines would dominate views from residential areas, historic sites, and popular coastal spots. This would directly impact visual amenity and diminish the qualities of naturalness and remoteness. Furthermore, the assessment does not adequately communicate the significance of these impacts, particularly in relation to the sensitive nature of the landscape.

Methodological issues have also been identified regarding the selection and presentation of visual viewpoints. There is evidence suggesting that the chosen viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially concerning important cultural heritage sites and valued landscapes. This risk of underestimating visual impact raises questions about the assessment's reliability.

Another significant concern is the lack of consideration for the interconnectedness of landscape, seascape, and cultural heritage. Key sites, such as the Calanais Standing Stones and other Scheduled Monuments, are part of a broader landscape that visually and spatially connects to the Atlantic horizon. Treating these assets as isolated overlooks their interdependence and leads to an incomplete understanding of how the proposed development would affect their context and cultural importance.

The potential 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 a deeper cultural and spatial harm that the application fails to adequately address.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The extent of the proposed changes 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 diminishes any claim of compliance with policy.

It is evident that the identified impacts cannot be effectively mitigated. The scale, height, and proximity of the turbines would create an unavoidable dominance. Therefore, the resulting changes are fundamental and permanent, not reducible to acceptable levels through mitigation efforts.

Overall, the assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation, reinforcing the conclusion that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The application does not provide sufficient detail to assess construction and pollution risks, which raises serious concerns. It involves significant seabed preparation and installation in a challenging Atlantic environment. However, there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application depends on mitigation and contingency measures to be created after consent is granted. This approach limits the ability to evaluate their effectiveness or adequacy.

The West Lewis coastline is particularly sensitive, supporting clean coastal waters and vital habitats that may be harmed by sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks adequate detail on prevention, control, or monitoring strategies.

There is also uncertainty about the scale and behaviour of sediment plumes that may result from seabed disturbances and cable installation. Robust modelling and clearly defined management strategies are necessary to understand the potential extent, duration, and ecological effects of these impacts. This uncertainty encompasses potential effects on marine species and habitats already recognised as sensitive in the broader assessment.

The lack of detailed emergency response procedures further heightens these issues. By postponing contingency planning until after consent, the application obstructs a proper evaluation of whether appropriate safeguards exist to deal with pollution incidents. This not only introduces procedural risk but also hinders the competent authority's ability to assess environmental protection measures before making a decision.

From a regulatory standpoint, deferring crucial environmental safeguards contradicts the Environmental Impact Assessment requirements. Significant effects and necessary mitigation must be evaluated before granting consent, and without this information, a lawful determination cannot occur. The application does not demonstrate compliance with policies related to environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The application under consideration is fundamentally flawed in its assessment of fisheries and marine life, failing to provide a thorough evaluation of the ecological and socio-economic impacts. The waters off the West Lewis coast are home to a vibrant marine ecosystem and support an active fishing industry. However, the application does not adequately demonstrate that these vital habitats and activities can be preserved without facing significant disruption.

A critical concern lies in the assumption made by the applicant that fishing activities can be displaced without any repercussions. There is a notable absence of evidence regarding the availability, accessibility, or suitability of alternative fishing grounds to accommodate the resultant pressure. This gap in information is crucial, as the potential for displacement poses risks of overfishing in other areas, which could have broader economic ramifications for the local fishing fleet. The lack of a clear, evidence-based assessment means that the potential impacts on fisheries and the livelihoods associated with them remain poorly understood.

The proposal further introduces considerable risks to marine species, particularly due to the underwater noise generated during the construction phase. The extensive use of high-energy hammer piling is expected to disturb marine life over large distances, particularly impacting species like dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises profound concerns; yet, the application minimizes the importance of these effects without adequate evidence to support such claims.

Additionally, there exists a contradiction within the application regarding the need for licences to permit harm to European Protected Species, even as the impacts are described as negligible. This inconsistency undermines the reliability of the assessment and raises serious questions about compliance with the Habitats Regulations, especially when harm is anticipated to a degree that necessitates legal authorisation.

The assessment does not take into account the cumulative impacts resulting from multiple pressures, such as habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive examination of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the associated socio-economic conditions.

From a policy standpoint, the application fails to demonstrate compliance with National Planning Framework 4 and the National Marine Plan. It does not provide evidence that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby 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 contradictions present in the application render the assessment inadequate and unreliable. These shortcomings impede a thorough evaluation of the impacts on marine life and fisheries.

TOURISM

The evaluation of tourism impacts is inadequate and neglects to consider the economic and social ramifications for a crucial sector of the Isle of Lewis economy. The tourism sector has seen substantial growth, rising from £65 million in 2017 to over £81.5 million, and supports more than 1,000 jobs while representing up to 16% of the island's

economy. Despite this, the application fails to analyse how the industrialisation of the seascape and the deterioration of environmental quality would affect Tourism Gross Value Added or the resilience of the wider economy.

Tourism fundamentally relies on the island's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Although the application states that 86% of visitors are attracted by the scenery, it does not provide a quantified assessment of how large-scale offshore infrastructure may impact visitor numbers, behaviour, or overall economic contributions. Additionally, the significance of environmental quality in supporting tourism has not been adequately addressed. The importance of unspoiled landscapes and dark skies to the visitor experience, along with the potential for growth in markets such as nature-based tourism and astro-tourism, has been overlooked. The lack of a Dark Skies Assessment exacerbates this issue, creating a substantial gap in understanding the impacts on an important and expanding sector of the local economy.

In an island community with limited economic diversification, the neglect of tourism impact assessments has broader implications for employment, local businesses, and community sustainability. The absence of a thorough Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as mandated by the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, especially concerning economic impact and the necessity to show net benefit. It conflicts with strategic objectives that recognise tourism as a priority growth sector and fails to provide adequate evidence for the competent authority to evaluate the economic consequences of the proposal.

In summary, the combination of unquantified tourism impacts, an inadequate assessment of environmental factors influencing visitor behaviour, and a lack of consideration for the island's economic dependency creates a significant evidential gap. This deficiency hinders a thorough evaluation 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 requirements for sustainable development as mandated by statutory duties, national policy, and evidential standards. This proposal echoes the core issues that resulted in the 2008 refusal of the Lewis Wind Power proposal, where the level of industrialisation was deemed unacceptable. It is now being presented under a policy framework that places heightened importance on biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this proposal. Critical gaps exist in baseline data, and the application relies on an undefined design envelope with unspecified mitigation measures. Key impact pathways have been omitted, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism

implications. Consequently, the Environmental Impact Assessment remains incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts.

Moreover, the application demonstrates clear procedural failures. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations outlined in the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment represents a material omission that prevents the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, thus rendering the application unfit for determination.

In terms of compliance with National Planning Framework 4, the proposal is in direct conflict. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage. Furthermore, it fails to show that health and wellbeing impacts are acceptable and lacks evidence of net economic benefits, particularly due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring potential impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainty persists regarding the environmental risks associated with this proposal. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to conclusively exclude adverse effects beyond reasonable scientific doubt has not been met, invoking the precautionary principle and preventing any lawful conclusion that the impacts are acceptable.

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, and the disruption of cultural and visual relationships would result in permanent effects that cannot be mitigated to an acceptable standard.

In summary, the application is both procedurally and substantively unfit for determination. The extensive information deficiencies, policy conflicts, and unresolved environmental risks preclude a lawful and evidence-based decision. Therefore, it is imperative that the competent authority refuses consent for this application or invokes the appropriate regulatory measures to secure the submission of the required missing information.

A formal request is thus made for the complete refusal of the Spiorad na Mara Offshore Wind Farm application.

Yours faithfully,

[Redacted]

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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. Upon reviewing the Environmental Impact Assessment Report and associated documentation, it is clear that there are significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The project is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. Concerns regarding the scale, proximity, and design of the development raise fundamental questions about its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis necessary for a lawful determination. There is a concerning absence of critical environmental data, and the baseline information provided is limited and inconsistent. Key elements of the proposal remain undefined, and the use of a flexible design framework obscures a clear understanding of the likely significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, while claims regarding negligible or non-significant effects are unsupported by robust evidence.

Additionally, clear and substantive conflicts with policy exist. 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 compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These inconsistencies directly impact the statutory tests required for consent and compromise the ability of the competent authority to determine the development's acceptability in policy terms.

The scale of this proposal is unprecedented for the area, with large turbines planned to be placed in close proximity to the shoreline, raising significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. In light of these circumstances, it is essential that the precautionary principle be applied.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a comprehensive evaluation of alternatives, which is crucial under the Environmental Impact Assessment regime. Instead of a systematic, evidence-based comparison of realistic alternatives that considers environmental effects, it offers a narrative on the project's evolution. This lack of structure fails to show that less harmful options have been adequately identified, assessed, and chosen over more damaging solutions.

Moreover, the application does not transparently compare alternative offshore locations, development scales, or design configurations. Specifically, it does not prove that the developer has earnestly contemplated placing turbines further offshore, where impacts on visual aesthetics, ecology, and coastal environments might be less severe. Given the sensitivity of the West Lewis coastline and the significance of proximity to shore in evaluating impacts, the absence of such analysis means one cannot conclude that the proposed siting is the least damaging option available.

The shortcomings also pertain to cable routing and landfall assessments, where there is a lack of evidence showing that alternative routes have been thoroughly examined to avoid or lessen impacts on sensitive areas. This includes locations of cultural and spiritual significance, such as Barvas Cemetery. The failure to provide a clear avoidance strategy and the absence of comparative analysis imply that mitigation by design has not been sufficiently implemented, relying instead on measures to mitigate effects after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, layout decisions, and infrastructure routing. This oversight represents a failure to adhere to the established mitigation hierarchy and obstructs the competent authority from determining whether more appropriate and less harmful alternatives might exist. Without a thorough assessment of alternatives, it cannot be asserted that the proposal aligns with sustainable development or relevant policy criteria.

From a policy standpoint, this deficiency jeopardises compliance with National Planning Framework 4, especially regarding the protection of natural environments, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant shortfall that ultimately leads to the conclusion that the application has not been adequately evaluated and cannot facilitate a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the application is fundamentally flawed, particularly concerning the treatment of the West Lewis coastline. This area is a dynamic cultural landscape where environment, language, tradition, and community are interwoven. Instead of recognising this interconnectedness, the application adopts a reductive view that portrays cultural heritage as merely a collection of static assets, neglecting their active social, cultural, and spiritual roles within the community.

A notable shortcoming is the handling of culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practice, yet the assessment treats them as fixed features, ignoring their ongoing use and significance. This misrepresentation leads to an inadequate understanding of cultural impacts and overlooks the vital role these sites play in community life.

Moreover, the assessment fails to address intangible cultural heritage, including the Gaelic language, local traditions, and the longstanding connection between the community and the coastal environment. These elements are integral to the identity of the area, yet they are entirely omitted from the evaluation, creating a significant gap in understanding the cultural implications of the development.

Concerns also arise regarding the rights of the community and their engagement in the process. The Gaelic-speaking population possesses a unique cultural identity akin to that of an Indigenous People, but the absence of a Free, Prior and Informed Consent process compromises the integrity of the assessment. This lack of meaningful participation undermines the legitimacy of the findings and disregards established principles of engaging communities in decisions that affect their cultural and environmental interests.

Another critical procedural deficiency is the non-compliance with the statutory requirement for an Island Communities Impact Assessment as stipulated in the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic implications for the island community, thereby rendering any determination unlawful.

From a policy standpoint, these failures place the proposal in conflict with National Planning Framework 4, particularly regarding the protection of historic assets and places. The neglect of both tangible and intangible heritage, along with the disregard for living cultural practices, clearly deviates from established policy requirements.

In summary, the overall lack of assessment concerning living heritage, intangible cultural value, community rights, and adherence to statutory obligations leads to a significant evidential gap. The application has not properly assessed the cultural impacts of the development, resulting in an insufficient basis for understanding the true cultural costs associated with the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application lacks a thorough assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change or the sensitivity of the environment. The West Lewis coastline is characterised by its unspoiled Atlantic horizon and an overwhelming sense of remoteness. The proposed large-scale turbines, situated close to the shoreline, would create a persistent and dominating industrial presence, fundamentally transforming this unique character and resulting in permanent and irreversible changes to the landscape.

Furthermore, the visual impact is not represented adequately within the application. The size and proximity of the turbines would overshadow views from residential areas, historic locations, and popular coastal sites, thereby directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not convey the significance of this impact within the context of such a sensitive landscape.

Concerns also arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This introduces the risk that the visual impact has been understated, casting doubt on the assessment's reliability.

Another critical shortcoming is the lack of evaluation regarding the interconnected relationships between landscape, seascape, and cultural heritage. Sites like the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape setting, connected by visual and spatial relationships to the Atlantic horizon. The assessment isolates these heritage assets, ignoring their interdependence and leading to an incomplete understanding of the impacts on their setting and cultural importance.

The industrialisation of the seascape would disrupt these connections, altering the context in which heritage assets are perceived and severing their bond with the natural horizon. This represents not just a visual impact but a wider cultural and spatial harm that the application fails to adequately assess.

From a policy perspective, the proposal directly contradicts National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The magnitude of change is incompatible with the need to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a robust worst-case assessment further weakens any assertion of compliance with policy requirements.

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

In summary, the assessment does not accurately capture the extent of the impact, the sensitivity of the environment, or the interconnected nature of landscape and heritage. These deficiencies impede a reliable evaluation and underscore the conclusion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The West Lewis coastline is characterised by clean coastal waters and important habitats that are particularly sensitive to sediment disturbance and contamination. The application acknowledges the presence of risks such as sediment mobilisation and accidental chemical or oil spills; however, it lacks sufficient detail on preventative, control, or monitoring measures for these risks. The assessment of construction and pollution risks associated with the proposal is incomplete, failing to provide the necessary detail to evaluate the likely environmental effects adequately.

The proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, it relies on mitigation and contingency measures that will be formulated post-consent, which undermines any meaningful assessment of their adequacy or effectiveness. This reliance on undefined future measures raises significant concerns given the sensitivity of the receiving environment.

Furthermore, there is uncertainty regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, the extent, duration, or ecological effects of these impacts cannot be determined. This uncertainty also extends to potential effects on marine species and habitats already identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application obstructs the ability to evaluate whether appropriate safeguards are in place to address pollution events. Such a deferral introduces procedural risk and undermines the capability of the competent authority to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the failure to provide critical environmental safeguards is in conflict with the requirements of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation measures are assessed before consent is granted; without this information, a lawful determination cannot be achieved. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the combination of undefined mitigation measures, the absence of detailed management plans, and the uncertainty regarding potential impacts renders the assessment materially deficient. These shortcomings significantly hinder a robust evaluation of construction and pollution risks and further support the conclusion that the application is incomplete.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the onshore infrastructure is insufficient and fails to encompass the full range of impacts from a project that should be considered as a cohesive whole. The

offshore turbines and the onshore works are inherently connected, yet their evaluation occurs separately, leading to a disjointed analysis that masks the true extent of environmental and socio-economic consequences.

Onshore components include cabling across protected moorland, the construction of a substation near Stornoway, and related access infrastructure that traverses sensitive landscapes. These activities necessitate excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, obstructing a comprehensive understanding of the project's environmental footprint.

By failing to address the onshore impacts adequately, the application hinders a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all project elements are assessed collectively; however, the disjunction between offshore and onshore evaluations leaves the combined repercussions on peatlands, habitats, and local communities inadequately explored.

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

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. The application fails to provide evidence that the requisite consents or processes have been initiated, bringing into question the deliverability and legal compliance of the project.

From a policy viewpoint, the lack of a comprehensive assessment of the project as a unified entity, alongside insufficient demonstration of protection for peatlands, habitats, and land use interests, is in direct conflict with the National Marine Plan and National Planning Framework 4. The inability to demonstrate that impacts can be avoided or mitigated further weakens the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that will be visible over long distances, leading to a continuous and intrusive “wall of light” effect across the western horizon. This change fundamentally alters the night-time environment along the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are vital to the area’s environmental quality, cultural identity, and tourism value.

The Environmental Impact Assessment notably lacks an evaluation of how this lighting

will impact visual amenity, landscape character, and the experience of residents and visitors. Given the significance of dark skies to the local identity and the emerging sector of astro-tourism, this omission represents a substantial gap in the overall landscape and environmental assessment.

Furthermore, there is no analysis of the impacts on nocturnal wildlife, including species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel, which are highly sensitive to artificial lighting. The absence of any lighting impact assessment or phototaxis study means that the potential effects of aviation lighting on these species, including disorientation and increased collision risk, have not been addressed.

The ornithological assessment relies solely on daytime survey data, which fails to capture nocturnal activity and associated risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this has not been assessed. The lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, the absence of these assessments conflicts with the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the overall assessment of landscape and seascape impacts, as the night-time character is an integral aspect of the environment.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fails to meet the requirements of sustainable development as outlined by statutory duties, national policy, and evidential standards. This application mirrors the critical issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the degree of industrialisation was deemed unacceptable. It is now submitted under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, yet it still falls short.

The application lacks a complete and reliable evidential basis for determination. Significant gaps exist in the baseline data, and the use of an undefined design envelope raises concerns. Mitigation measures are not specified, and key impact pathways such as those related to nocturnal wildlife, comprehensive onshore infrastructure, and

tourism effects have been omitted. Consequently, the Environmental Impact Assessment is incomplete and does not provide a clear understanding of the likely significant effects or residual impacts.

There are also evident procedural failures in the application process. The absence of a compliant Island Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the complete Social Impact Assessment constitutes a material omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

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

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

Furthermore, 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 represent permanent changes that cannot be effectively mitigated.

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

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

Additional Comments

This development is too close and too large and does not impact the island communities positively

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: D69A1C73

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a review of the Environmental Impact Assessment Report and associated documentation, revealing significant deficiencies in planning, environmental considerations, cultural impact, and procedural compliance. The proposed development is situated off the west side of the Isle of Lewis, an area notable for its Atlantic-facing coastline, largely untouched environment, and vibrant cultural identity. There are pressing concerns regarding the proposal's scale, proximity to the shore, and overall design, which challenge its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation necessary for lawful determination. Critical environmental data is absent, with baseline information being both limited and inconsistent, and many key components of the proposal are inadequately defined. The reliance on a flexible design framework complicates the ability to ascertain significant environmental effects, and the unspecified mitigation measures hinder any meaningful assessment of their effectiveness. Consequently, the available documentation does not facilitate a comprehensive understanding of the potential environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects due to a lack of robust evidence.

Moreover, the proposal presents clear and significant conflicts with established policies. It appears misaligned with the National Marine Plan, the Environmental Impact Assessment regulations, and National Planning Framework 4, particularly concerning biodiversity, cultural heritage, natural environments, and public health. The application does not convincingly demonstrate adherence to national requirements aimed at safeguarding biodiversity, addressing climate considerations, and maintaining environmental integrity. These discrepancies directly affect the statutory criteria for consent and compromise the competent authority's ability to determine whether the development is acceptable under policy guidelines.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shoreline, raises considerable issues related to landscape capacity, visual impact, and broader environmental repercussions. Collectively, the lack of comprehensive information, dependence on undefined mitigation strategies, evidential shortcomings, and significant policy non-compliance illustrate that the application is incomplete and insufficient for lawful determination. Under these circumstances, it is imperative that the precautionary principle is invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application seeks consent based on an Environmental Impact Assessment Report that is materially deficient, lacking a full, transparent, and reliable account of the likely environmental effects associated with the proposal. A significant concern is the use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This approach introduces substantial uncertainty and undermines the integrity of the assessment, preventing the consistent application of a worst-case scenario. As a result, the impacts presented may not accurately reflect what will ultimately be constructed, hindering both public understanding and the ability of the competent authority to grasp the true extent of environmental effects.

Additionally, the application places considerable reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent under the premise that environmental harm will be addressed subsequently prevents any meaningful evaluation of the effectiveness of these measures or assessment of residual impacts. Deferring critical information to post-consent stages is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established prior to determination.

The report also exhibits significant evidential deficiencies, including gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. These issues result in uncertainty regarding the scale and significance of impacts, particularly in cases where conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory requirements.

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

Overall, the reliance on an undefined design envelope, the absence of specified mitigation measures, and existing gaps in baseline data render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and robust assessment of environmental effects, meaning that the competent authority cannot adequately determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate assessment of alternatives, which does not comply with the statutory requirements of the Environmental Impact Assessment regime. It lacks a structured and reasoned comparison of realistic alternatives based on environmental effects, instead presenting a narrative account of project evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and selected over more damaging solutions.

There is no transparent or evidence-based comparison of alternative offshore locations, development scales, or design configurations. The application does not show that the developer has seriously considered positioning turbines further offshore, where potential visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline, as well as the critical importance of proximity to shore in determining impact, the failure to conduct such analysis undermines any assertion that the proposed siting is the least damaging option.

The shortcomings also affect cable routing and landfall assessment, as there is inadequate evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas such as Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis indicates that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

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

From a policy standpoint, this deficiency impacts 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 is a material omission that contributes to the overall conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

A significant gap exists in the consideration of otters, which are classified as a European Protected Species. The application neglects to accurately identify and assess their use of coastal regions for foraging and movement. This oversight of their core foraging range and behavioural tendencies leads to an inadequate evaluation of potential impacts from construction disturbance, noise, and increased activity. Consequently, the conclusions drawn regarding the lack of significant effects on otters are undermined.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for development lacks the necessary evidential support to conclude that there will be no adverse effects on protected seabird populations. It fails to provide adequate evidence regarding species associated with significant sites like the Lewis Peatlands and St Kilda. The assessment does not thoroughly consider the vital feeding grounds of these birds, particularly concerning declining species such as Kittiwakes and Fulmars. There are significant gaps and weaknesses in the methodologies used, which may lead to an underestimation of mortality rates, especially given that baseline data is incomplete and the behavioural responses of the species are not fully understood.

Furthermore, the site is situated within a key migratory corridor, posing serious risks to birds travelling between the United Kingdom and Iceland. The application does not sufficiently evaluate the long-term impacts of potential sustained mortality in this corridor, nor does it address how this might affect species with smaller global populations.

The conclusions drawn within the application are contradictory. While the developer claims there will be no significant adverse effects, they also present a Habitats Regulations derogation case, which suggests that they anticipate potential harm. This inconsistency raises doubts about the assessment's reliability and its alignment with scientific standards. As such, it does not meet the evidential threshold required to ascertain that there will be no adverse effects on the integrity of protected sites.

In addition, the application fails to comply with the National Planning Framework 4 concerning biodiversity protection. The inability to demonstrate that internationally important seabird populations will not be adversely affected puts the proposal at odds with national policy. Collectively, these deficiencies in the assessment render it unreliable, as they stem from internal inconsistencies, methodological shortcomings, and insufficient evidence. Overall, these issues mean that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development fails to adequately assess cultural heritage and community identity, particularly regarding the West Lewis coastline, which is a living cultural landscape. The connection between the environment, language, tradition, and community is overlooked in the application, which adopts a reductive view of heritage as isolated and static assets, rather than considering their dynamic social, cultural, and spiritual roles within the community.

Significant deficiencies arise in the treatment of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices, yet they are classified in the assessment as static features, neglecting their ongoing use and significance. This mischaracterisation leads to an incomplete evaluation of cultural effects and fails to appreciate the cemeteries' role in community life.

Moreover, the application does not address intangible cultural heritage elements, which include the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity, yet they are entirely omitted from the assessment, resulting in a substantial oversight. Without considering these elements, the true cultural impact of the development cannot be comprehensively understood.

There are also critical issues concerning community rights and engagement. The Gaelic-speaking population, which embodies distinct characteristics of an Indigenous People, has not been afforded a process of Free, Prior and Informed Consent. This lack

of meaningful engagement undermines the assessment's credibility and does not align with the established principles regarding participation in matters that affect cultural and environmental interests.

Furthermore, the absence of a compliant Island Communities Impact Assessment represents a significant procedural failure, as mandated by the Islands (Scotland) Act 2018. This omission prevents the competent authority from fulfilling its legal responsibilities to evaluate the social, cultural, and economic repercussions on the island community, thereby hindering a lawful determination of 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 places. The neglect to assess both tangible and intangible heritage and to acknowledge living cultural practices signifies a clear deviation from policy requirements.

In conclusion, the failure to adequately consider living heritage, intangible cultural value, community rights, and statutory obligations results in a significant evidential gap. The assessment does not properly evaluate the cultural impacts of the development, nor does it provide a sufficient basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of visual and landscape impacts is insufficient and does not adequately capture the extent of change or the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon, a lack of development, and a profound sense of remoteness. The introduction of large-scale turbines near the shoreline would lead to a continuous and overpowering industrial presence, significantly altering this character and resulting in a permanent and irreversible change to the landscape.

The application fails to properly convey the magnitude of the visual alteration. Due to the size and proximity of the turbines, they would dominate views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the level of impact or its importance within the context of such a sensitive landscape.

There are significant concerns regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that these viewpoints may not fully represent the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been underestimated, calling into question the reliability of the assessment.

Another critical shortcoming is the lack of an evaluation of the interconnected relationship between seascape, landscape, and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape context linked by visual and spatial connections to the Atlantic horizon. The assessment treats these as standalone entities instead of recognising their interdependence, leading to an incomplete evaluation of impacts on their setting

and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing how heritage assets are perceived and disconnecting them from the natural horizon. This signifies not merely a visual impact but a wider cultural and spatial detriment that has not been sufficiently assessed in the application.

From a policy standpoint, the proposal stands in direct opposition to National Planning Framework 4, which concerns the protection of natural spaces and historic assets. The extent of change contradicts the obligation to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with policy.

It is evident that the impacts identified are not amenable to effective mitigation. Given the scale, height, and proximity of the turbines, their presence would be overwhelming and inescapable. The resulting change is thus fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment inadequately represents the magnitude of impact, the environment's sensitivity, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the argument that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the adequacy of the assessment of construction and pollution risks, which remains incomplete and lacks the necessary detail for evaluating the potential environmental effects. With substantial seabed preparation and installation works taking place in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is particularly troubling. The application appears to depend on the preparation of mitigation and contingency measures post-consent, which inhibits any meaningful assessment of their efficacy.

This reliance on undefined future measures is especially alarming given the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk of sediment disturbance and contamination. Although the application acknowledges risks, such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents a thorough evaluation of whether appropriate safeguards will be in place to address pollution incidents. This creates procedural risks and undermines the competent authority's ability to assess environmental protection measures at the determination stage.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the requirements established by the Environmental Impact Assessment regime. It is imperative that likely significant effects and mitigation measures be evaluated prior to granting consent; absent this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate compliance with relevant policy requirements concerning environmental protection and water quality.

In summary, the lack of clearly defined mitigation measures, absence of detailed management plans, and uncertainty about potential impacts culminate in a materially deficient assessment. These deficiencies hinder a thorough evaluation of construction and pollution risks, further substantiating the argument that the application is incomplete.

FISHERIES AND MARINE LIFE

The application proposes development that raises significant concerns regarding its effects on fisheries and marine life. The waters off the West Lewis coast are known for both a diverse marine ecosystem and an active fishing industry, yet the proposal does not adequately demonstrate how these vital uses and habitats will be protected or maintained without causing substantial disruption.

A critical concern lies in the assumption that fishing activities can be displaced without any adverse effects. The application lacks evidence to confirm that alternative fishing grounds are available, accessible, or capable of absorbing the additional pressure that would result from such displacement. This absence of information is important, as it risks potential overfishing in other areas and could have wider economic repercussions for the local fishing fleet. Without a robust and evidence-based assessment, the potential impacts on fisheries and local livelihoods remain unclear.

Furthermore, the proposal introduces significant risks to marine species, particularly due to the underwater noise generated during construction activities. The use of high-energy hammer piling over an extended duration is expected to create disturbances over large areas, negatively affecting species like dolphins. The anticipated impact on a considerable portion of the local bottlenose dolphin population raises substantial concerns, yet the application downplays these effects without adequate supporting evidence.

The application exhibits a noticeable inconsistency where the need for licences to

permit harm to European Protected Species is recognised, while simultaneously characterising those impacts as negligible. This contradiction undermines the credibility of the assessment and raises questions about its compliance with the Habitats Regulations, especially where harm is anticipated to a level that requires legal authorisation.

In addition, the assessment neglects to consider cumulative impacts resulting from multiple pressures such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to understand the overall impact on marine ecosystems and socio-economic conditions.

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

Overall, the deficiencies related to evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies within the assessment contribute to its incompleteness and unreliability. These shortcomings hinder a thorough evaluation of the potential impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposal presents a fragmented assessment of onshore infrastructure, which is materially incomplete and fails to adequately account for the interrelated impacts of the offshore turbines and onshore works. This separation obscures the true environmental and socio-economic consequences of what is fundamentally a single integrated project. The onshore components involve cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. Importantly, these activities entail excavation in areas of deep peat, particularly within Barvas Moor, an essential carbon store and an ecologically sensitive habitat. The application lacks a thorough evaluation of these impacts, which inhibits a full understanding of the project's overall environmental footprint.

Furthermore, the approach taken prevents a proper assessment of cumulative effects, as the Environmental Impact Assessment process mandates that all aspects of a project must be evaluated collectively. The existing separation of offshore and onshore components fails to capture the combined impacts on peatlands, habitats, and local communities, leaving significant gaps in understanding.

There are critical risks to sensitive habitats, including machair systems and peatland environments, which are protected by policy. The application does not convincingly demonstrate that impacts on these ecosystems have been comprehensively evaluated or that adequate avoidance measures have been considered, revealing a significant evidential shortfall concerning biodiversity protection.

The proposal also introduces concerns related to carbon balance; the disruption of peatland has the potential to release stored carbon, thereby creating a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently tackle this issue or confirm that the overall carbon balance remains advantageous.

In addition, the routing of infrastructure through active croft land raises potential conflicts with established land use and legal rights. There is a lack of evidence indicating that necessary consents or processes have been initiated, which prompts serious questions regarding the deliverability and lawful execution of the project.

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

In summary, the separation of project components, the absence of a comprehensive evaluation, and the lack of substantiating evidence regarding environmental and land use impacts culminate in an application that is incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally altering the night-time environment. This lighting is visible over long distances and represents a significant change to the area's visual amenity and landscape character. However, the Environmental Impact Assessment fails to evaluate the impact of this lighting, which is a material omission given the importance of dark skies to the identity of the West Lewis coastline and its emerging tourism sectors, including astro-tourism.

Furthermore, the absence of any assessment regarding nocturnal wildlife is particularly concerning. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase their risk of collision. Despite this, the application does not provide any lighting impact assessment or phototaxis study to evaluate how the proposed aviation lighting may affect these vulnerable species or lead to increased mortality rates.

The ornithological assessment relies solely on daytime survey data, which fails to account for nocturnal activity and the associated risks for species like Kittiwakes that may forage or migrate at night. This lack of site-specific night-time data creates a critical gap in understanding the ecological impacts of the proposal. Without a thorough assessment of these nocturnal impacts, it remains 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 cannot be fulfilled, invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, the omission of these assessments contradicts National Planning Framework 4, which relates to the protection of natural places and environmental quality. It also undermines the overall assessment of landscape and seascape impacts, as the night-time character is a vital aspect of the environment.

In summary, the absence of any evaluation of dark skies and nocturnal wildlife constitutes a significant evidential gap. The failure to provide baseline data, impact modelling, and species-specific analysis results in an incomplete application that is 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.

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: 16138F61

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the applicable marine licensing and Environmental Impact Assessment regimes. It draws upon a review of the Environmental Impact Assessment Report and associated documentation, highlighting various deficiencies related to planning, environmental matters, cultural aspects, and procedural elements. The development is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. There are profound concerns regarding the scale, proximity, and design of the proposal, particularly in terms of its compatibility with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and crucial elements of the proposal remain undefined. The flexible design framework employed obscures the understanding of likely significant effects, and the reliance on unspecified mitigation measures precludes any assessment of their effectiveness. Consequently, the documentation fails to provide a full or informed understanding of the impacts on environmental, cultural, or community aspects, and claims of negligible or non-significant effects are not substantiated by robust evidence.

There are significant and clear policy conflicts at play. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that the national requirements to safeguard biodiversity, climate interests, and environmental integrity are achievable. Such conflicts are directly linked to the statutory tests necessary for consent and severely undermine the ability of the competent authority to conclude that the development meets policy acceptability.

The unprecedented scale of the proposal raises significant concerns due to the large turbines being positioned in close proximity to the shoreline, leading to worries about landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy non-compliance illustrates that the application is incomplete and incapable of receiving a lawful determination. In light of these circumstances, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency, failing to deliver a reliable account of the potential environmental effects of the proposed project. The approach of employing a flexible Project Design Envelope, which does not commit to precise turbine sizes, layouts, or configurations, introduces considerable uncertainty. This uncertainty undermines the assessment's integrity and means that the predicted impacts may not accurately reflect the development as it will ultimately be constructed, hindering both public understanding and the competent authority's ability to grasp the true extent of environmental impacts.

Moreover, the application leans heavily on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought on the premise that any environmental damage will be addressed subsequently, which obstructs any meaningful evaluation of their effectiveness or assessment of residual impacts. This deferral of essential information to stages post-consent is procedurally unacceptable and runs counter to the intentions of the Environmental Impact Assessment regime, which demands that significant effects and mitigation strategies be clearly identified prior to determination.

There are also substantial evidential shortcomings, including notable gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. These issues yield uncertainty regarding the scale and significance of impacts, especially when conclusions of negligible or non-significant effects are made without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that cannot be reconciled with statutory obligations.

Consequently, the application does not satisfy the evidential threshold established under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate adherence to National Planning Framework 4, including stipulations related to biodiversity protection and environmental integrity, as it remains unclear whether impacts have been thoroughly assessed or if adequate safeguards are present.

In summary, the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data result in the Environmental Impact Assessment Report being both unreliable and incomplete. These flaws inhibit a lawful and rigorous assessment of environmental effects, leaving the competent authority ill-equipped to make a decision based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a thorough assessment of alternatives, which is a requirement of the Environmental Impact Assessment regime. Instead of offering a detailed comparison of viable alternatives based on their environmental effects, it merely outlines the evolution of the project. This narrative does not show that the developer has properly identified, evaluated, and chosen less harmful options over

more damaging ones.

There is a lack of clear and evidence-based comparisons regarding offshore locations, development scales, and design configurations. Notably, the application does not indicate that the possibility of placing turbines further offshore has been adequately considered, despite this option likely reducing visual, ecological, and coastal impacts. The West Lewis coastline is sensitive, and proximity to the shore is critical in assessing impact. Therefore, the absence of such analysis makes it impossible to conclude that the proposed siting is the least damaging choice.

This inadequacy also extends to the routing of cables and landfall assessments, where there is insufficient evidence that alternative routes have been thoroughly explored to minimise impacts on sensitive areas. This includes locations of cultural and spiritual significance like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis shows that mitigation by design has not been implemented, relying instead on measures to mitigate after design.

Consequently, the application does not show that environmental harm has been minimised through careful site selection, layout, and routing of infrastructure. This neglects the established mitigation hierarchy, preventing the competent authority from ascertaining whether less harmful and more suitable alternatives are available. Without a solid assessment of alternatives, it cannot be concluded that the proposal is a sustainable or compliant solution.

From a policy standpoint, this inadequacy compromises adherence to National Planning Framework 4, especially regarding the protection of natural areas, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission, contributing to the overall conclusion that the application has not been sufficiently assessed to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

Of particular concern is the omission regarding otters, which are classified as a European Protected Species. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and behavioural patterns results in an insufficient assessment of the potential effects stemming from construction disturbance, noise, and increased activity. This oversight undermines any conclusions drawn regarding the absence of significant effects on this species.

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

The methodological limitations present mean that any assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. Without sufficient baseline data, it is impossible to conduct a meaningful evaluation of cumulative and indirect impacts, such as seasonal variations and broader ecosystem interactions. This creates a level of uncertainty regarding the genuine scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been adequately identified or assessed. The uncertainty introduced by these shortcomings hinders the ability to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these circumstances, the granting of consent cannot be justified legally.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The 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.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application lacks a thorough assessment of how these vital uses and habitats can be preserved without significant disruption. One major concern is the assumption that fishing activities can be relocated without negative effects. The application does not provide evidence that alternative fishing grounds exist or can handle the additional pressure, which poses a serious risk of overfishing in other areas and could have wider economic repercussions for local fishermen.

Additionally, the proposal presents considerable risks to marine species, notably due to underwater noise from construction activities. The prolonged use of high-energy hammer piling could disturb marine life over large distances, particularly affecting dolphins. The application suggests that the disturbance to a significant portion of the local bottlenose dolphin population is not substantial, yet this claim is made without adequate supporting evidence, raising serious concerns about its validity.

Furthermore, the application acknowledges the necessity for licences to allow harm to European Protected Species, while simultaneously downplaying the potential impacts as negligible. This contradiction raises doubts about the assessment's reliability and

compliance with the Habitats Regulations, especially where harm is expected to require legal authorisation. The assessment also neglects to address cumulative impacts from various pressures such as habitat disturbance, noise, and fishing displacement. Without a thorough evaluation of these combined effects, it is impossible to accurately gauge 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 establish that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, making it difficult to conclude that the proposal aligns with sustainable development principles. Collectively, the lack of evidence regarding fishing displacement, the underestimation of noise impacts, and the internal inconsistencies render the assessment insufficient and untrustworthy. These issues hinder any reliable evaluation of the potential effects on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

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

The Environmental Impact Assessment fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. Given the importance of dark skies to the area’s identity and to emerging tourism sectors, such as astro-tourism, this omission is significant and results in a clear gap in the overall landscape and environmental assessment.

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species like Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increased collision risk. The application lacks a lighting impact assessment or a phototaxis study, failing to assess how aviation lighting may affect these species or potentially increase mortality rates.

The reliance on daytime survey data in the ornithological assessment does not adequately capture nocturnal activity or the associated risks. Species such as Kittiwakes, which may forage or migrate at night, are also vulnerable to disorientation from artificial lighting, yet the risk remains unassessed. The absence of site-specific night-time data presents a critical gap in understanding ecological impacts.

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

lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. It further undermines the broader assessment of landscape and seascape impacts, as the night-time character is integral to the environment.

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

TOURISM

The proposed development has significant implications for tourism on the Isle of Lewis, a sector that is integral to the local economy. Tourism is reliant on the area's wild coastline, near-pristine landscape, dark skies, and overall sense of remoteness. The application recognises that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified analysis of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the economic contributions associated with tourism.

Economic growth within tourism has been notable, with revenue increasing from £65 million in 2017 to over £81.5 million, and supporting more than 1,000 jobs while accounting for up to 16% of the island's economy. However, the application does not assess how the industrialisation of the seascape and the potential decline in environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. This lack of analysis creates uncertainty regarding whether the development could yield a net economic benefit or adversely affect an established and burgeoning sector.

Moreover, the assessment neglects to examine the critical role that environmental quality plays in attracting tourists. Unspoiled landscapes and dark skies are essential to enhancing visitor experiences and tapping into emerging markets such as nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this issue, creating a considerable gap in understanding the impacts on this evolving aspect of the local economy.

In a community that already faces challenges due to limited economic diversification, the oversight in assessing tourism impacts carries broader implications for local employment, businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that the economic vulnerabilities tied to tourism have not been properly 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 concerning economic impact and the necessity to show a net benefit. It also contradicts strategic objectives that prioritise

tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic ramifications of the proposal.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not provide a comprehensive or dependable evidential foundation for determination.

There are critical deficiencies in baseline data, a reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment represents a significant omission. These failures obstruct the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal directly conflicts with National Planning Framework 4, as it does not demonstrate the necessary protections 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, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring the impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist and may be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent internally. The evidential requirement to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative impact on tourism constitute permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with policy contradictions and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to request the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 8520EED7

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 lacks the necessary comprehensiveness and transparency to properly evaluate the likely environmental effects of the proposal. The flexible Project Design Envelope, which does not commit to specific dimensions, layouts, or configurations for the turbines, creates considerable uncertainty. This ambiguity hampers the ability to apply a worst-case scenario consistently, undermining the reliability of the assessment and failing to convey the true scale of potential environmental impacts to both the public and the relevant authorities.

Furthermore, the application places heavy reliance on mitigation measures, monitoring strategies, and management plans that are not yet defined. This approach seeks consent on the premise that any environmental harm will be managed at a later date, thus inhibiting meaningful evaluation of their effectiveness and the assessment of residual impacts. Such deferral of vital information to post-consent phases is procedurally unacceptable and contradicts the core aim of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigation measures must be clearly defined before any determination.

The report also exhibits significant evidential deficiencies, marked by gaps in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This lack of sufficient information leads to uncertainty about the scale and significance of impacts, especially when negligible or non-significant effects are asserted without adequate supporting data. The shortcomings in information hinder an understanding of cumulative and worst-case impacts and introduce scientific uncertainty that conflicts with statutory requirements.

Consequently, the application does not satisfy the evidential standards necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Moreover, the proposal fails to demonstrate compliance with National Planning Framework 4, which includes requirements for biodiversity protection and environmental integrity. It cannot be established that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the combination of reliance on an undefined design envelope, the absence of specified mitigation strategies, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, leaving the competent authority unable to make an informed decision based on the information currently available.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory obligations, national policy, and evidential standards. It mirrors the central issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite being presented under

a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application does not provide a comprehensive or dependable evidential foundation for determination.

There are critical deficiencies in baseline data, a reliance on an undefined design envelope, and unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of likely significant effects or residual impacts.

The procedural shortcomings are also evident. The lack of a compliant Island Communities Impact Assessment contravenes statutory duties under the Islands (Scotland) Act 2018, and the failure to disclose the full Social Impact Assessment represents a significant omission. These failures obstruct the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

This proposal directly conflicts with National Planning Framework 4, as it does not demonstrate the necessary protections 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, primarily due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been adequately assessed, obscuring the impacts on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist and may be significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are either incomplete or inconsistent internally. The evidential requirement to rule out adverse effects beyond reasonable scientific doubt has not been satisfied, invoking the precautionary principle and preventing a lawful conclusion regarding acceptable impacts.

Moreover, the proposal would lead to considerable and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative impact on tourism constitute permanent effects that cannot be adequately mitigated.

In summary, the application is procedurally and substantively unfit for determination. The extent of informational deficiencies, coupled with policy contradictions and unresolved environmental risks, precludes a lawful and evidence-based decision. Therefore, it is imperative that the competent authority either refuse consent on these grounds or invoke the necessary regulatory provisions to request the submission of the missing information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 48DC64B2

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. An analysis of the Environmental Impact Assessment Report and accompanying documentation reveals significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly in relation to its compliance with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a sufficient evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is limited and inconsistent. Many key aspects of the proposal remain undefined. The reliance on a flexible design framework impedes a clear understanding of the likely significant effects, while the dependence on unspecified mitigation measures means that their effectiveness cannot be assessed. Consequently, the documentation fails to facilitate a full or informed understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are apparent and substantial conflicts with existing policies. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These discrepancies directly affect the statutory tests necessary for consent and hinder the competent authority's ability to determine the development's acceptability in policy terms.

The unprecedented scale of the proposal presents significant challenges, with large turbines located in close proximity to the shoreline, raising serious concerns about landscape capacity, visual dominance, and environmental impact. When considering the insufficiency of information, the reliance on undefined mitigation strategies, evidential weaknesses, and evident policy non-compliance, it becomes clear that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks completeness and transparency regarding the likely environmental effects of the proposal. The reliance on a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, introduces substantial uncertainty. This lack of specificity impedes a consistent worst-case scenario application, thereby compromising the integrity of the assessment. Consequently, the impacts reported may not accurately represent the eventual development, limiting both public understanding and that of the competent authority concerning the true extent of environmental effects.

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

There are considerable evidential gaps, including insufficient baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. These shortcomings result in uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effect conclusions lack robust supporting data. The failure to provide adequate information hampers a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty incompatible with statutory obligations.

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

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

ASSESSMENT OF ALTERNATIVES

The application presents significant deficiencies in its assessment of alternatives, which do not meet the statutory requirements of the Environmental Impact Assessment regime. It fails to provide a structured and reasoned comparison of realistic alternatives based on their environmental effects. Instead, it offers a narrative account of the project's evolution, which does not effectively demonstrate that less harmful options

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

Moreover, there is a lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. The developer has not adequately considered placing turbines further offshore, where visual, ecological, and coastal impacts would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical importance of proximity to the shore in determining impact, the absence of this analysis means it cannot be concluded that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including cultural and spiritual sites like Barvas Cemetery. The lack of a clear avoidance strategy, along with the absence of comparative analysis, indicates that mitigation by design has not been adequately considered, resulting in an over-reliance on post-design mitigation measures.

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application fails to provide a reliable assessment of marine ecology and protected species, particularly within the highly sensitive West Lewis coastal environment. This area is known for its biological activity, yet the baseline data presented is incomplete, and the methodologies employed do not effectively capture species presence, behaviour, and habitat use. Consequently, there is insufficient evidence to evaluate potential impacts accurately.

A notable gap is found in the assessment of otters, a European Protected Species, where the application does not appropriately acknowledge their active use of coastal regions for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leaves the potential effects of construction disturbance, noise, and increased activity inadequately addressed. This undermines any conclusions suggesting no significant effects on the otter population.

In addition, the assessment of basking sharks is flawed due to its reliance on aerial

surveys, which are subject to substantial detection bias, especially in Atlantic conditions. This method is likely to underestimate their presence compared to established land-based observations, which indicate frequent use of these waters. The omission of such relevant data contributes to an incomplete baseline and diminishes the reliability of the conclusions drawn.

The methodological shortcomings mean that the conclusions of negligible or non-significant effects rest on assumptions rather than solid evidence. Without adequate baseline data, it is impossible to conduct a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This uncertainty raises concerns about the actual level of risk posed to marine species and habitats.

From a regulatory viewpoint, the application does not adhere to the Environmental Impact Assessment regime or National Planning Framework 4 standards, as there has been a failure to properly identify and assess protected species. The level of uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Thus, under these circumstances, consent cannot be granted lawfully.

Overall, the lack of complete baseline data, flawed methodologies, and unsupported conclusions collectively undermine the assessment's reliability. These issues obstruct a thorough evaluation of the impacts on marine ecology and protected species, leading to the conclusion that the application is founded on insufficient evidence.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development presents significant concerns regarding its impact on local wildlife, particularly on the internationally important seabird populations along the west coast of the Isle of Lewis. These populations, many of which are already in decline, are critical to the area's biodiversity. However, the application fails to adequately demonstrate that these species will not suffer adverse effects. The site is situated within vital foraging areas and migratory pathways, yet the assessment provided does not thoroughly evaluate the risks associated with displacement, collision, or habitat loss.

There exists a critical contradiction within the application itself, where the developer asserts that there will be no significant adverse effects while also putting forth a case for Habitats Regulations derogation, which is typically invoked in situations where significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are not backed by sufficient evidence. Furthermore, the assessment lacks adequate proof that seabird species linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of their feeding grounds is insufficiently addressed, and reliance on modelling methodologies introduces uncertainty, particularly concerning species that are already in severe decline, like Kittiwakes and Fulmars.

The proposed siting of turbines within a recognised migratory corridor adds another layer of risk, potentially obstructing a primary flight path used by species migrating between the United Kingdom and Iceland. The assessment does not effectively evaluate the long-term consequences of ongoing mortality in this corridor or the potential impact on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data deficiencies and the limitations of modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This invokes the precautionary principle and inhibits a lawful conclusion in favour of consent.

The deficiencies noted also signify non-compliance with the National Planning Framework 4, particularly concerning biodiversity protection and the safeguarding of natural assets. The failure to prove that the development will not adversely impact internationally important seabird populations places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of potential impacts, reinforcing the conclusion that the application does not satisfy the statutory requirements necessary for approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is significantly flawed and does not recognise the West Lewis coastline as a dynamic cultural landscape. Here, environment, language, tradition, and community are deeply intertwined. The application takes a simplistic view, treating heritage as a collection of separate, unchanging assets instead of understanding their ongoing social, cultural, and spiritual significance within the community.

A major shortcoming is evident in how the assessment handles culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These cemeteries are active burial grounds and sites of spiritual practice, yet they are classified as static features. This approach neglects their continued use and the potential impacts of development on their surroundings. Such mischaracterisation leads to an incomplete understanding of the cultural implications and overlooks their vital role in community life.

Moreover, the assessment does not account for intangible cultural heritage, such as the Gaelic language, local traditions, and the community's enduring connection to the coastal environment. These aspects are fundamental to the area's identity but are completely omitted from the analysis, indicating a significant oversight. Without acknowledging these elements, the true cultural impact of the development remains unclear.

Concerns also arise regarding community engagement and rights. The Gaelic-speaking population has a distinct cultural identity, reflecting characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent. This lack of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles for participation in decisions that impact cultural and environmental matters.

Additionally, there is a notable procedural failure due to the absence of a compliant Island Communities Impact Assessment, which is legally required under the Islands (Scotland) Act 2018. Without this assessment, the competent authority cannot adequately evaluate the social, cultural, and economic consequences for the island community. This omission alone renders a lawful determination impossible.

From a policy standpoint, these shortcomings directly contradict the National Planning Framework 4, particularly regarding the preservation of historic assets and places. The neglect of both tangible and intangible heritage, along with the failure to acknowledge living cultural practices, represents a stark deviation from policy expectations.

Overall, the disregard for living heritage, intangible cultural value, community rights, and statutory responsibilities results in a significant lack of evidence. The cultural impacts of the proposed development have not been appropriately assessed, and the application fails to provide a robust basis for determining the true cultural costs associated with 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 of visual and landscape impacts is critically flawed, failing to adequately reflect the sensitivity of the West Lewis coastline and the extent of change that would result from the introduction of large-scale turbines. This coastline is characterised by its open Atlantic horizon, undeveloped nature, and a strong sense of remoteness. The proposed turbines would create a continuous industrial presence that would irreversibly alter this unique character, fundamentally transforming the landscape.

The application does not sufficiently depict the scale of the visual changes that would ensue. Given their size and proximity to the shoreline, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, which would detrimentally affect visual amenity and compromise the essential qualities of naturalness and remoteness. The current assessment fails to accurately communicate the significance of these impacts on such a delicate landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. It appears that these viewpoints do not adequately represent the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and valued landscapes. This raises the possibility that the visual impact has been understated, thereby compromising the reliability of the assessment.

Moreover, there is a significant oversight in how the relationship between landscape,

seascape, and cultural heritage is evaluated. Notable sites like the Calanais Standing Stones and other Scheduled Monuments form part of a broader landscape that is visually and spatially connected to the Atlantic horizon. The assessment treats these heritage assets as separate entities rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, changing the way in which heritage assets are experienced and severing their connection to the natural horizon. This results not only in a visual impact but also a significant cultural and spatial harm that has not been adequately addressed.

From a policy standpoint, the proposal is in direct conflict with the National Planning Framework 4, which aims to protect natural places and historic assets. The extent of the proposed changes is inconsistent with the need to maintain landscape character, visual amenity, and the context of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of compliance with these policies.

Additionally, the identified impacts cannot be successfully mitigated. Given the scale, height, and proximity of the turbines, their presence would be inescapable and dominant. The change would thus be fundamental and permanent, rather than something that could be mitigated to an acceptable level.

In summary, the assessment inadequately represents the scale of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and firmly indicate that the proposal is incompatible with the necessary protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is significantly lacking, which hampers the ability to assess the likely environmental impacts. The proposal involves considerable seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which obstructs any meaningful assessment of their effectiveness or adequacy.

This dependence on unspecified future measures raises alarms given the delicate nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats that are at risk from sediment disruption and contamination. While the application acknowledges potential hazards, including sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on how such incidents will be prevented, managed, or monitored.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes

resulting from seabed disturbance and cable installation. Without reliable modelling and explicitly 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 recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application undermines the ability to evaluate whether adequate safeguards exist to address pollution events. This creates procedural risks and diminishes the capacity of the competent authority to properly assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies are evaluated prior to consent; without this information, a lawful determination cannot be reached. Additionally, the application fails to illustrate adherence to policy requirements concerning environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and an active fishing industry, both of which are at risk from the proposed development. The application fails to provide a thorough evaluation of the ecological and socio-economic impacts, particularly regarding fisheries and marine life. A key concern is the assumption that fishing activities can be displaced without adverse consequences. There is no evidence presented that alternative fishing grounds are available, accessible, or capable of absorbing any additional pressure. This is a critical omission, as it raises the potential for overfishing in other areas, which could have detrimental economic effects on the local fishing fleet. Without a robust and evidence-based assessment, it is impossible to fully understand the implications for fisheries and the livelihoods dependent 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 for an extended period is likely to disturb marine life over large distances, notably affecting local species such as dolphins. The application underestimates the impact on a considerable portion of the local bottlenose dolphin population, raising serious concerns, yet it fails to provide sufficient evidence to support its conclusions regarding these effects.

There are clear inconsistencies within the application, as it acknowledges the need for licences to permit harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially where potential harm necessitates legal authorisation.

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

From a policy perspective, 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, which prevents 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 within the application result in an assessment that is incomplete and unreliable. These shortcomings hinder a robust evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The proposed development lacks a comprehensive assessment of onshore infrastructure, resulting in an incomplete evaluation of the project's impacts. The offshore turbines and the associated onshore works are interconnected; however, their assessment is conducted separately. This fragmented approach obscures the full extent of the environmental and socio-economic consequences of what is essentially a singular integrated project.

The onshore infrastructure includes cabling that traverses protected moorland, the construction of a substation near Stornoway, and the development of access routes through sensitive landscapes. These operations entail excavation in areas of deep peat, particularly within Barvas Moor, an important carbon store and ecologically sensitive area. The application fails to provide a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By neglecting to adequately assess the onshore impacts, the application obstructs a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all aspects of a project should be evaluated collectively. The existing separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain unclear.

Moreover, there are substantial risks posed to sensitive habitats, including machair systems and peatland environments that are protected by policy. The application does not adequately demonstrate that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This raises serious concerns about biodiversity protection and highlights a significant evidential gap.

The proposal also brings forth issues regarding carbon balance. Disturbing peatland can release stored carbon, potentially resulting in a carbon debt that contradicts renewable energy objectives. The application inadequately addresses this matter and fails to show that the overall carbon balance is favourable.

Additionally, routing infrastructure through active croft land may conflict with existing land use and legal rights. The application does not supply evidence that the necessary consents or processes have been initiated, which raises doubts about the project's deliverability and legal implementation.

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

In summary, the combination of separating project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts renders this section of the application incomplete and unreliable, inhibiting a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is distinguished by its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism appeal. The proposed development introduces permanent red aviation lighting that will be visible over considerable distances, thereby creating a continuous and intrusive "wall of light" effect across the western horizon and fundamentally transforming the night-time environment.

There is no evaluation of how this lighting will impact visual amenity, landscape character, or the experiences of both residents and visitors. This failure is particularly concerning given the vital role that dark skies play in the region's identity and the development of emerging tourism sectors, including astro-tourism. The lack of consideration for these impacts results in a clear deficiency in the overall landscape and environmental assessment.

Moreover, the application does not evaluate the potential impacts on nocturnal wildlife. Certain species, including the Manx Shearwater, European Storm Petrel, and Leach's

Storm Petrel, are notably sensitive to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The absence of a lighting impact assessment or phototaxis study means that the proposal fails to evaluate how the aviation lighting could affect these species or contribute to increased mortality rates.

The situation is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity or associated risks. For instance, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting, yet this risk has not been examined. The lack of site-specific night-time data creates a substantial gap in understanding the ecological impacts.

In the absence of an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would suffer adverse effects. The evidential standard necessary to eliminate adverse effects beyond reasonable scientific doubt is not fulfilled, thus invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 with respect to the safeguarding of natural environments and environmental quality. It also weakens the comprehensive assessment of landscape and seascape impacts, given that night-time character is an integral component of the environment.

In summary, the failure to assess 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 application presents significant deficiencies in its assessment of tourism impacts, overlooking the economic and social ramifications for a critical sector of the Isle of Lewis economy. Tourism, which is vital to the area, heavily relies on its wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. Notably, the application states that 86% of visitors are attracted by the scenery. However, it fails to provide a quantified analysis of how the proposed large-scale offshore infrastructure might influence visitor numbers, behaviour, or overall economic contributions to the area.

The tourism sector has seen remarkable growth, escalating from £65 million in 2017 to over £81.5 million, while supporting more than 1,000 jobs and constituting up to 16% of the island's economy. Despite this progress, the application does not examine how the anticipated industrialisation of the seascape and a potential decline in environmental quality could affect Tourism Gross Value Added or the broader economic resilience of the region. Without this critical analysis, it remains unclear whether the development would yield a net economic benefit or jeopardise an established and expanding sector.

Moreover, the assessment inadequately addresses the significance of environmental quality in enhancing tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences. The neglect of a Dark Skies Assessment exacerbates the already substantial gap in understanding the potential impacts on this increasingly recognised segment of the local economy, which includes nature-based and astro-tourism markets.

In an island community characterised by limited economic diversification, the lack of a thorough evaluation of tourism impacts carries broader implications for local employment, businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities, mandated under the Islands (Scotland) Act 2018, have not been sufficiently considered.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4, particularly concerning economic impacts and the necessity to illustrate net benefits. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks the requisite evidence for the competent authority to assess the economic consequences of the proposal.

Taken as a whole, the failure to quantify tourism impacts, evaluate the environmental factors influencing visitor behaviour, and acknowledge the island's economic dependencies leads to a significant evidential gap. This gap hinders a comprehensive assessment of the economic effects and reinforces the notion that the application is fundamentally incomplete.

SUMMARY

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

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

Procedural failures are evident as well. The absence of a compliant Island

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

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

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

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

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

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

Additional Comments

Having moved from South Ayrshire, where there are many, many wind farms and ongoing battles with endless proposals, I have some insight into the impact of these developments. Because of this I submit my objection to this proposal.

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: 885ECBBD

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.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies and lacks a comprehensive, transparent, or reliable analysis of the potential environmental impacts of the proposed development. The adoption of a flexible Project Design Envelope, which lacks commitments to specific dimensions, layouts, or configurations for the turbines, introduces considerable uncertainty. This uncertainty hinders the ability to apply a worst-case scenario consistently, thereby compromising the integrity of the assessment. Consequently, the impacts described may not accurately represent those associated with the eventual construction, which obstructs both the public and the competent authority from grasping the true extent of the environmental effects.

Consent is sought based on mitigation measures, monitoring strategies, and management plans that remain undefined at this stage. This reliance implies that any environmental harm will be resolved post-consent, thereby impeding any substantive evaluation of the effectiveness of these measures or assessment of residual impacts. Such deferral of crucial information to later stages is procedurally unacceptable and contradicts the core intent of the Environmental Impact Assessment regime, which mandates that significant likely effects and mitigation strategies be clearly established before determination.

Moreover, substantial evidential gaps exist within the report, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. This leads to uncertainty regarding the magnitude and significance of the impacts, especially when negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear understanding of both cumulative and worst-case impacts, introducing a level of scientific uncertainty that is incompatible with statutory requirements.

As a result, the application does not satisfy the evidential threshold mandated by the Habitats Regulations, which aims to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly regarding protected species and sensitive habitats. Additionally, the proposal fails to demonstrate adherence to National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it has not been established that impacts have been comprehensively assessed or that suitable safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These shortcomings preclude a lawful and robust assessment of environmental effects and mean the competent authority cannot make a determination based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application presented is fundamentally flawed in its assessment of alternatives, failing to meet the necessary standards outlined in the Environmental Impact Assessment regime. Instead of offering a detailed and structured evaluation of realistic alternatives based on their environmental consequences, the documentation merely

recounts the evolution of the project. This approach does not adequately establish that less harmful alternatives have been thoroughly identified, evaluated, and preferred over more damaging options.

There is a clear lack of transparency and evidence in the comparison of potential offshore sites, varying development scales, and design options. Notably, the application does not convincingly show that the developer has genuinely contemplated placing turbines further out to sea, which would likely lessen visual, ecological, and coastal impacts. Given the delicate nature of the West Lewis coastline, and the critical significance of distance from shore in assessing environmental impact, the omission of such analysis precludes any assertion that the proposed siting is the least damaging choice.

The shortcomings extend to the assessment of cable routing and landfall, where there is inadequate evidence indicating that alternative routes have been diligently investigated to circumvent or mitigate impacts on sensitive sites, including culturally and spiritually significant areas like Barvas Cemetery. The absence of a clear avoidance strategy, paired with a failure to conduct a comparative analysis, reveals that mitigation by design has not been implemented. Instead, there is an overreliance on measures intended to mitigate impacts after the design phase.

Consequently, the application does not demonstrate that environmental harm has been minimised through careful site selection, infrastructure layout, and routing decisions. This represents a significant departure from the established mitigation hierarchy, hindering 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 determined that the proposal is sustainable or aligns with relevant policies.

From a policy standpoint, these deficiencies call into question compliance with National Planning Framework 4, particularly regarding the safeguarding of natural environments, cultural heritage, and community well-being. The failure to provide a structured and comparative assessment constitutes a material omission, further reinforcing the conclusion that the application has not been sufficiently evaluated and cannot facilitate 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 an assessment that is fundamentally unreliable, lacking both robust evidence and consistency. Significant gaps in information lead to an inability to conclude that the internationally important seabird populations along the west coast of the Isle of Lewis will remain unaffected. This area is home to many seabird species that are already in decline, and yet the application fails to demonstrate, as required, that these species will not experience adverse effects.

The development is situated within critical foraging areas and migratory routes, yet the implications of potential displacement, collision risk, and habitat loss have not been thoroughly evaluated. A major inconsistency arises from the developer's assertion of no significant adverse effects while simultaneously presenting a Habitats Regulations derogation case. Such a case is only warranted when significant harm is anticipated, casting doubt on the reliability of the assessment and suggesting that its conclusions are not substantiated by the available evidence.

Moreover, the assessment does not adequately address the potential impact on seabirds linked to protected sites such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not fully acknowledged, and the reliance on modelling raises further uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars. The methodologies employed may underreport mortality rates, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor adds another layer of risk, as it effectively obstructs a primary flight path for species migrating between the United Kingdom and Iceland. The application fails to comprehensively assess the long-term consequences of sustained mortality within this corridor and the potential ramifications for species with smaller global populations.

From a regulatory standpoint, the application does not satisfy the evidential standards needed to confirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory findings, along with data deficiencies and modelling constraints, indicates that the threshold of beyond reasonable scientific doubt has not been met. This situation necessitates the application of the precautionary principle and undermines any lawful conclusion in favour of consent.

Ultimately, the deficiencies highlighted represent a failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets. The inability to demonstrate that important seabird populations will remain unharmed places the proposal in direct opposition to national policy. Collectively, these issues contribute to the conclusion that the application fails to meet the statutory requirements essential for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of community identity and cultural heritage is seriously lacking. It does not recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community interact deeply. The application reduces heritage to static, isolated assets instead of acknowledging their ongoing social, cultural, and spiritual roles in the community.

Culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated inadequately. These sites are active burial grounds and places of spiritual significance, yet the assessment labels them as mere static features, failing to account for their continued relevance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete understanding of the cultural impacts and ignores their importance in community life.

Moreover, the assessment overlooks intangible cultural heritage, which includes the Gaelic language and local traditions, as well as the community's long-standing bond with the coastal environment. These aspects are essential to the area's identity but 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 involvement. The Gaelic-speaking population has a unique cultural identity akin to that of Indigenous Peoples, yet there has been no Free, Prior and Informed Consent process. The lack of genuine engagement calls into question the credibility of the assessment and fails to align with established participation principles in decisions affecting cultural and environmental matters.

There is a crucial procedural oversight regarding the absence of a proper Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this assessment, the relevant authority cannot meet its legal obligations to assess the social, cultural, and economic effects on the island community. This lack of assessment alone obstructs a lawful decision.

From a policy standpoint, these shortcomings directly contradict the requirements of the National Planning Framework 4, particularly concerning the safeguarding of historical assets. The failure to account for both tangible and intangible heritage and to recognise ongoing cultural practices clearly deviates from established policy guidelines.

Overall, the neglect to evaluate living heritage, intangible cultural significance, community rights, and necessary statutory assessments results in a major evidential deficiency. The cultural effects of the development remain unexamined, and the application fails to provide an adequate foundation for determining the true cultural costs of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The evaluation of seascape, landscape, and visual impacts associated with the proposal is significantly flawed and does not sufficiently address the extent of change or the sensitivity of the affected environment. The character of the West Lewis coastline is marked by its unspoilt Atlantic horizon, natural qualities, and profound sense of remoteness. The establishment of large-scale turbines near the shoreline would introduce a persistent industrial presence, which would fundamentally disrupt this character, leading to a permanent and irreversible alteration of the landscape.

The application inadequately illustrates the extent of the visual transformation. The considerable scale and proximity of the turbines would overshadow views from residential areas, historic sites, and frequently visited coastal spots, which would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the seriousness of this impact or its importance within the context of such a delicate landscape.

There are significant methodological issues regarding the choice and representation of visual viewpoints. It appears that some viewpoints may not adequately represent the most sensitive receptors or the most adverse scenarios, particularly concerning critical

cultural heritage sites and high-value landscapes. This raises concerns that the extent of visual impact has been downplayed, thereby questioning the credibility of the assessment.

Moreover, a critical shortcoming is the failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Significant sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape context connected by visual and spatial relationships to the Atlantic horizon. The evaluation considers these as separate entities instead of recognising their interrelationship, leading to an incomplete understanding of the impacts on their setting and cultural value.

The industrialisation of the seascape would sever these essential relationships, changing the context in which heritage assets are perceived and disrupting their link to the natural horizon. This constitutes not merely a visual impact but a broader cultural and spatial detriment that the application does not sufficiently address.

From a policy standpoint, the proposal stands in direct contradiction to the National Planning Framework 4 concerning the safeguarding of natural areas and historic assets. The magnitude of change is inconsistent with the requirement to protect landscape character, visual amenity, and the setting of culturally significant locations. The lack of a comprehensive worst-case assessment further diminishes any assertion of policy adherence.

It is evident that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their visibility would be overwhelming and unavoidable. Consequently, the resulting alteration is fundamental and permanent, not something that can be mitigated to an acceptable degree.

In conclusion, the assessment fails to accurately depict the scale of impact, the environment's sensitivity, and the interconnected relationships between landscape and heritage. These shortcomings hinder a dependable evaluation and strongly support the assertion that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

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

Particularly alarming is this reliance on undefined future measures, especially in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean

coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it lacks sufficient detail regarding the prevention, control, or monitoring of these risks.

There is considerable uncertainty surrounding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. In the absence of robust modelling and clearly defined management strategies, it remains impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also pertains to potential effects on marine species and habitats already recognised as sensitive within the broader assessment.

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

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

In summary, the deficiencies related to the undefined mitigation measures, the absence of detailed management plans, and the uncertainty surrounding potential impacts collectively indicate that the assessment is materially deficient. These inadequacies obstruct a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry. However, the assessment of fisheries and marine life provided in the application is inadequate, failing to deliver a comprehensive evaluation of ecological and socio-economic impacts. The application lacks evidence that fishing activities can be displaced without significant consequences, raising concerns about the potential for overfishing in alternative locations. This oversight is critical, as the absence of alternative fishing grounds that are accessible and capable of supporting increased pressure risks economic repercussions for the local fishing fleet.

Moreover, the proposal poses substantial risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over an extended timeframe is likely to disturb marine life over large distances, specifically affecting species such as dolphins. The anticipated disturbance to a notable segment of the local bottlenose dolphin population is concerning, yet the

application appears to downplay the significance of these potential impacts without adequate supporting evidence.

An inconsistency within the application arises from the acknowledgement of the need for licences to permit harm to European Protected Species while simultaneously stating that the impacts are negligible. This contradiction diminishes the credibility of the assessment and raises serious questions regarding compliance with the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Furthermore, the assessment does not take into account the cumulative impacts stemming from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined 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 establish that the development can coexist with current marine users or avoid unacceptable impacts on marine biodiversity, which inhibits any determination that the proposal constitutes sustainable development.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

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

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

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

communities.

Moreover, there are considerable risks to sensitive habitats, such as machair systems and peatland environments, which are protected by policy. The application fails to prove that the impacts on these habitats have been fully evaluated or that suitable avoidance measures have been implemented. This results in a significant evidential gap regarding biodiversity protection.

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

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

Moreover, there is no evaluation of the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are known to be sensitive to artificial lighting, which can cause disorientation and increase collision risks. The application fails to include any lighting impact assessment or phototaxis

study, meaning it does not address how aviation lighting might affect these species or contribute to increased mortality.

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

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

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

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

TOURISM

The assessment presented regarding tourism impacts is severely lacking and does not sufficiently evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. It is important to note that tourism is primarily reliant on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application acknowledges that 86% of visitors are attracted by the scenery, yet it fails to provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution of tourism.

Tourism has experienced significant growth, increasing from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. However, the application does not consider how the industrialisation of the seascape and the subsequent loss of environmental quality could impact Tourism Gross Value Added or broader economic resilience. Without this critical analysis, it is impossible to ascertain whether the development would yield a net economic benefit or harm an established and growing sector.

Moreover, the assessment neglects to take into account the role of environmental quality in bolstering tourism, particularly the significance of unspoiled landscapes and dark skies for visitor experience, alongside burgeoning markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this issue, resulting in a significant gap in understanding the impacts on a recognised

and expanding aspect of the local economy.

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

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4, particularly regarding economic impact and the necessity to show a net benefit. It also contradicts strategic objectives that designate 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, evaluate the environmental factors influencing visitor behaviour, and recognise the island's economic dependency leads to a substantial evidential gap. This prevents a thorough evaluation of economic effects and contributes to the conclusion that the application is incomplete.

SUMMARY

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

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

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

Furthermore, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments,

and cultural heritage. The impacts on health and wellbeing are not shown to be acceptable, and there is no evidence of a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from offshore and onshore elements has not been adequately conducted, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

Having lived on the Isle of Lewis in the past, for several years, I feel that the proposed site for the wind turbines will be very detrimental to the local habitat and have an impact on tourism. Local people do not support the use of this site and they should be the most listened to in this matter.

Whilst I realise that the area around the Scottish islands sees the necessary levels of wind required, sighting these from the land masses is not the correct policy.

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: 4B66E6E6

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 founded on an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental, cultural, and procedural areas. Situated off the west side of the Isle of Lewis, the location is characterised by its Atlantic-facing coastline, a nearly untouched environment, and a strong cultural identity. The scale, design, and proximity of the proposal raise crucial questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential basis for lawful determination. Key environmental data is absent, baseline information is both limited and inconsistent, and critical elements of the proposal remain unspecified. The flexible design framework used obscures a clear understanding of potential significant effects, while the proposed mitigation measures, which have not been detailed, render it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive or informed understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust evidence.

There are evident and significant conflicts with existing policies. The proposal shows inconsistency with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially regarding biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate that national standards for protecting biodiversity, climate interests, and environmental integrity can be achieved. These conflicts directly relate to the statutory tests necessary for consent and compromise the competent authority's ability to determine the proposal's acceptability within policy frameworks.

The scale of the proposed development is unprecedented for this area, featuring large turbines situated near the shoreline, which introduces substantial concerns regarding landscape capacity, visual dominance, and environmental impact. Collectively, the lack of adequate information, dependence on undefined mitigation strategies, evidential shortcomings, and clear policy non-compliance indicate that the application is incomplete and cannot support a lawful determination. In light of these factors, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment concerning marine ecology and protected species is significantly lacking, failing to offer a comprehensive or dependable understanding of ecological receptors within the West Lewis coastal environment. This region is noted for its sensitivity and biological activity, yet the baseline data remains inadequate, with the methodologies employed not effectively capturing species presence, behaviour, and habitat utilisation. Consequently, the assessment does not establish a solid evidential basis for evaluating potential impacts.

One notable gap is the treatment of otters, a species protected under European law. The application does not adequately recognise or assess their active use of coastal areas for foraging and movement. This oversight regarding their core foraging range and behavioural patterns means that the potential effects of construction-related disturbances, noise, and increased human activity have not been sufficiently evaluated. Such omissions undermine any claims made about the absence of significant effects on this species.

Additionally, the assessment of basking sharks presents further deficiencies. The reliance on aerial surveys introduces considerable detection bias, particularly under Atlantic conditions. This method is likely to underestimate their presence, especially when compared to established land-based observations that indicate frequent usage of these waters. The failure to incorporate or appropriately consider this data leads to an incomplete baseline, further diminishing the credibility of the conclusions reached.

These methodological shortcomings result in conclusions regarding negligible or non-significant effects being based on assumptions rather than robust evidence. The lack of adequate baseline data also hinders meaningful assessments of cumulative and indirect impacts, which include seasonal variations and broader ecosystem interactions. As a result, there is substantial uncertainty regarding the true extent 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 and National Planning Framework 4, given that protected species have not been correctly identified or evaluated. The uncertainty introduced by these deficiencies precludes the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, granting consent would not be lawful.

In conclusion, the combination of incomplete baseline data, flawed methodologies, and unsubstantiated conclusions renders the assessment unreliable. These shortcomings obstruct a thorough evaluation of impacts on marine ecology and protected species, contributing to the overall determination that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The application for the proposed development lacks the evidential rigor necessary to conclude that there will be no adverse effects on protected sites. The west coast of the

Isle of Lewis is home to internationally significant seabird populations, many of which are already experiencing decline. However, the assessment fails to adequately demonstrate that these species will remain unaffected. Furthermore, the siting of turbines within a recognised migratory corridor poses an additional and substantial risk, as it potentially obstructs a primary flight path for species migrating between the United Kingdom and Iceland. The implications of sustained mortality within this corridor have not been sufficiently evaluated.

A critical inconsistency within the application arises from the developer's assertion of no significant adverse effects while simultaneously advancing a Habitats Regulations derogation case. This case is required only when significant harm is anticipated, casting doubt on the reliability of the assessment and suggesting that the conclusions drawn are not substantiated by the supporting evidence. Moreover, the methodologies employed are likely to underestimate mortality rates, particularly for species such as Kittiwakes and Fulmars, which are already in severe decline. The assessment does not sufficiently consider the importance of key feeding grounds associated with protected sites, including the Lewis Peatlands and St Kilda, and the reliance on modelling approaches introduces further uncertainty.

From a regulatory standpoint, the assessment does not meet the evidential threshold needed to ascertain that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and methodological limitations, indicates that the standard of beyond reasonable scientific doubt has not been achieved. This situation invokes the precautionary principle, which precludes a lawful conclusion in favour of consent. Additionally, the deficiencies highlighted reflect non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In conclusion, the assessment is fundamentally unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidential support. These flaws hinder a robust evaluation of potential impacts and contribute to the overall determination that the application does not satisfy the statutory requirements necessary for approval.

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.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed development involves the introduction of large-scale turbines in close proximity to the West Lewis coastline, an area characterised by its open Atlantic horizon, undeveloped nature, and significant sense of remoteness. This would create a continuous and dominant industrial presence, fundamentally altering the landscape and resulting in a permanent and irreversible transformation of the area.

The application's assessment of seascape, landscape, and visual impacts is deficient. It does not adequately convey the magnitude of the visual change that would occur. The

scale and proximity of the turbines mean that they would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and eroding the key qualities of naturalness and remoteness. Moreover, the assessment fails to properly represent this level of impact or its significance in the context of a sensitive landscape.

There are serious methodological concerns regarding how visual viewpoints have been selected and presented. Evidence indicates that these viewpoints may not fully reflect the most sensitive receptors or worst-case scenarios, particularly concerning important cultural heritage sites and high-value landscapes. This raises the risk that the assessment has understated the magnitude of visual impact, undermining its reliability.

Additionally, the assessment fails to consider the interconnected relationship between landscape, seascape, and cultural heritage adequately. Significant sites, such as the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape setting tied together by visual and spatial relationships to the Atlantic horizon. Treating these sites as isolated assets rather than recognising their interdependence results in an incomplete evaluation of their cultural significance and the impacts on their setting.

The industrialisation of the seascape would sever these relationships, fundamentally altering how heritage assets are experienced and disrupting their connection to the natural horizon. This represents not only a visual impact but also 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 concerning the protection of natural places and historic assets. The scale of the proposed changes is incompatible with the requirement to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a robust worst-case assessment significantly undermines any claim of policy compliance.

It is evident that the impacts identified cannot be effectively mitigated. Due to the turbines' scale, height, and proximity, their presence would be dominant and unavoidable. Consequently, the change is fundamental and permanent and cannot be reduced to an acceptable level through mitigation.

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

FISHERIES AND MARINE LIFE

The evaluation of fisheries and marine life within the application is notably inadequate, lacking a thorough assessment of ecological and socio-economic repercussions. The

waters off the West Lewis coast are home to a rich marine ecosystem and an active fishing industry, yet the proposal fails to illustrate how these vital habitats and uses will be preserved or sustained without incurring significant disruption.

A major concern is the erroneous assumption that fishing activities can be relocated without repercussions. The application does not provide any evidence that alternative fishing grounds exist, are accessible, or can accommodate additional pressure. This significant gap raises the risk of overfishing in other areas and could have far-reaching economic impacts on the local fishing fleet. In the absence of a clear, evidence-based evaluation, the effects on fisheries and community livelihoods remain obscured.

Furthermore, the project poses considerable risks to marine species, particularly due to the underwater noise associated with construction activities. The extended use of high-energy hammer piling is anticipated to cause disturbance over considerable distances, impacting marine life such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is alarming, yet the application minimises these concerns without adequate supporting data.

There is a troubling inconsistency in the application regarding the recognition of the need for licences to permit harm to European Protected Species, while simultaneously categorising the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises significant issues concerning adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

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

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not adequately show that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby obstructing any conclusion that the project constitutes sustainable development.

In summary, the deficiencies stemming from the lack of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies render the assessment incomplete and untrustworthy. These shortcomings significantly impede a comprehensive evaluation of impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The omission of any assessment concerning dark skies and nocturnal wildlife represents a significant flaw in the Environmental Impact Assessment. The West Lewis coastline is known for its exceptionally dark skies, which are vital to the area's

environmental quality, cultural identity, and tourism appeal. The proposal introduces permanent red aviation lighting that would be visible over extensive distances, creating a disruptive “wall of light” effect across the western horizon, fundamentally changing the night-time environment.

Moreover, the application does not evaluate the effects of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the area's identity and the growth of tourism sectors like astro-tourism. The absence of these assessments points to a clear deficiency in the overall landscape and environmental evaluation.

More alarmingly, there is no examination of the impacts on nocturnal wildlife. Species including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and an increased risk of collisions. The lack of a lighting impact assessment or phototaxis study means there is no analysis of how aviation lighting could affect these species or heighten mortality risks.

This gap is exacerbated by the dependence on daytime survey data in the ornithological assessment, which fails to account for nocturnal behaviours and associated dangers. Species such as Kittiwakes, which may forage or migrate at night, are susceptible to disorientation from artificial lighting, yet this risk has not been examined. The absence of site-specific night-time data creates a crucial shortcoming in understanding ecological consequences.

Without an evaluation of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites may be adversely affected. The necessary evidential standard to demonstrate the absence of adverse effects beyond reasonable scientific doubt cannot be achieved, invoking the precautionary principle and hindering a lawful determination.

From a policy standpoint, this omission contravenes National Planning Framework 4 regarding the safeguarding of natural areas and environmental quality. It also diminishes the comprehensive assessment of landscape and seascape effects, as the character of night-time environments is a fundamental aspect of the overall ecology.

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

TOURISM

The assessment of tourism impacts is critically inadequate and neglects to evaluate the economic and social repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region’s wild coastline, nearly untouched landscape, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are

attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, behaviours, or overall economic contributions.

Tourism has experienced substantial growth, rising from £65 million in 2017 to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy. Nonetheless, the application does not examine how the industrialisation of the seascape and the degradation of environmental quality might affect Tourism Gross Value Added or broader economic resilience. Without such an analysis, it remains unclear if the development would offer a net economic benefit or harm an established and expanding sector.

The failure to consider the significance of environmental quality in enhancing tourism, including the vital role of unspoiled landscapes and dark skies in shaping visitor experiences and fostering emerging markets like nature-based tourism and astro-tourism, further exacerbates this issue. The lack of a Dark Skies Assessment creates a considerable gap in understanding the potential impacts on this recognised and flourishing aspect of the local economy.

Given the context of an island community with limited economic diversification, the disregard for assessing tourism impacts carries broader implications for employment, local businesses, and community sustainability. The omission of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as mandated under the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly concerning economic impacts and the necessity to show net benefits. It also contradicts strategic objectives that designate tourism as a priority growth sector, lacking sufficient evidence for the competent authority to evaluate the economic consequences of the proposal.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed in its ability to meet the requirements for sustainable development as defined by statutory obligations, national policies, and evidential standards. It reflects the same core issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. This current proposal is presented under a more rigorous policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

There is an evident lack of a complete and reliable evidential basis for the

determination of this application. Significant gaps exist in baseline data, and the application continues to employ an undefined design envelope. It relies on unspecified mitigation measures and omits critical impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a comprehensive understanding of likely significant effects or residual impacts.

Procedural failures are also apparent. The lack of a compliant Island Communities Impact Assessment constitutes a breach of statutory duty under the Islands (Scotland) Act 2018. Additionally, the failure to fully disclose the Social Impact Assessment is a significant omission. These deficiencies 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 stands in direct opposition to the National Planning Framework 4. It does not adequately protect biodiversity, natural habitats, and cultural heritage, fails to demonstrate acceptable health and wellbeing impacts, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. Moreover, the cumulative impacts of offshore and onshore components have not been sufficiently assessed, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

There remain uncertainties and potential significance regarding environmental risks. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, in certain instances, inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, thus invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

This proposal will have too much of an impact on too many things for no benefit to the local community.

Wildlife, pollution, changing landscape.

Not good at all.

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: F2E08471

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 marine licensing and Environmental Impact Assessment regulations. The objection arises from a thorough review of the Environmental Impact Assessment Report and accompanying documentation, highlighting significant deficiencies in planning, environmental considerations, cultural implications, and procedural adherence. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale, design, and proximity to the shoreline raise serious concerns about its alignment with statutory requirements, national policies, and sustainable development principles.

The application lacks a solid evidential foundation for a lawful determination. There is critical missing environmental data, with limited and inconsistent baseline information, leaving many key elements of the proposal undefined. The use of a flexible design framework obscures the understanding of potential significant effects, and without specific mitigation measures outlined, it is impossible to assess their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidence.

Moreover, there are substantial conflicts with existing policy frameworks. The proposal is 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 interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, compromising the authority's ability to determine that the development aligns with policy standards.

Unprecedented in scale for this location, the proposal features large turbines situated in close proximity to the shoreline, raising considerable concerns about landscape capacity, visual impact, and environmental ramifications. In light of the insufficient information provided, reliance on undefined mitigation strategies, evidential shortcomings, and clear policy violations, it is evident that the application is incomplete and unfit for a lawful determination. Therefore, the precautionary principle must be invoked in this case.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

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

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

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

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

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the standards of sustainable development as mandated by statutory duties and national policy. It echoes the principal issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Despite being presented under a more robust policy framework that emphasises biodiversity,

peatland protection, landscape integrity, and community wellbeing, the application does not address these concerns adequately.

There are significant gaps in the evidential basis provided for the application. The reliance on an undefined design envelope, unspecified mitigation measures, and the lack of crucial impact assessments, such as those affecting nocturnal wildlife, complete onshore infrastructure, and tourism, renders the Environmental Impact Assessment incomplete. This inadequacy impedes a thorough understanding of the potential significant effects and residual impacts associated with the project.

Moreover, procedural shortcomings are evident, notably the absence of a compliant Island Communities Impact Assessment, which violates statutory requirements under the Islands (Scotland) Act 2018. The non-disclosure of a complete Social Impact Assessment is another critical omission. These failures hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is also misaligned with the National Planning Framework 4. It does not demonstrate the necessary protections for biodiversity, natural environments, and cultural heritage, nor does it show that health and wellbeing impacts are manageable. Furthermore, the lack of tourism impact modelling means that a net economic benefit cannot be substantiated. The cumulative impacts of both offshore and onshore components have not been properly evaluated, obscuring their effects on peatlands, carbon balance, habitats, and crofting land.

Uncertainties regarding environmental risks persist, with incomplete assessments concerning marine ecology, seabirds, protected species, and marine mammals. The evidential threshold needed to demonstrate the absence of adverse effects beyond reasonable scientific doubt has not been achieved, thereby invoking the precautionary principle. This failure prevents a lawful determination that impacts are acceptable.

The proposed development would also effect substantial and irreversible changes to a sensitive landscape. The industrialisation of the Atlantic-facing coastline, the degradation of dark skies, disruption to cultural and visual connections, and adverse impacts on tourism are permanent consequences that cannot be mitigated effectively.

In conclusion, the application is procedurally and substantively unfit for determination. The significant deficiencies in information, coupled with policy discrepancies and unresolved environmental risks, obstruct a lawful and evidence-based decision-making process. The competent authority should therefore refuse consent for the Spiorad na Mara Offshore Wind Farm application in its entirety.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 3FB291FA

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 frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant material deficiencies in planning, environmental consideration, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide an adequate evidential basis for lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the development's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The proposal is fundamentally flawed due to the deficiencies within the Environmental Impact Assessment Report, which lacks a complete, transparent, and reliable evaluation of its likely environmental effects. Central to this issue is the adoption of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations. This uncertainty hampers a consistent application of a worst-case scenario, compromising the assessment's integrity and leaving both the public and the competent authority uninformed about the true extent of the environmental impacts that may arise from the development.

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

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

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

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

ASSESSMENT OF ALTERNATIVES

The application fails to provide an adequate 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 impacts, the application merely outlines the project's development narrative. This

methodology does not sufficiently demonstrate that less harmful alternatives have been identified, assessed, and chosen over more damaging options.

There is a lack of transparent, evidence-based comparisons of alternative offshore locations, development scales, and design configurations. Specifically, the application does not show that the developer has genuinely considered positioning turbines further offshore, where it is likely that visual, ecological, and coastal impacts would be lessened. Given the sensitivity of the West Lewis coastline and the crucial nature of proximity to shore in assessing impact, the absence of such analysis impedes any conclusion that the proposed site is the least damaging.

These inadequacies also extend to the cable routing and landfall assessment, where there is insufficient evidence that alternative routes have been thoroughly examined to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant areas like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis indicates a failure to implement mitigation by design, relying instead on post-design mitigation measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through effective site selection, layout, and infrastructure routing. This reflects a failure to adhere to the established mitigation hierarchy, inhibiting the competent authority from determining whether more appropriate, less harmful alternatives are available. Without a comprehensive assessment of alternatives, one cannot conclude that the proposal is a sustainable or policy-compliant solution.

From a policy standpoint, this deficiency compromises compliance with National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant omission that adds to the conclusion that the application has not been sufficiently evaluated and cannot sustain a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

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

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

the conclusions regarding the absence of significant effects on otters.

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

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application fails to meet the necessary evidential standard required to demonstrate that it will not adversely affect internationally important seabird populations. With significant gaps in evidence and internal inconsistencies, the ornithological assessment is fundamentally flawed. This situation is particularly concerning given that the west coast of the Isle of Lewis is home to many seabird species that are already in decline. The assessment does not adequately evaluate the implications of habitat loss, collision risk, or displacement within key foraging areas and migratory pathways.

There is a troubling contradiction in the application: the developer asserts that there will be no significant adverse effects while simultaneously advancing a case for Habitats Regulations derogation. This derogation is only necessary when significant harm is anticipated, which raises doubts about the reliability of the assessment and its conclusions. The evidence provided is insufficient to ensure that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The importance of these feeding grounds has not been sufficiently accounted for, and the reliance on modelling methods introduces uncertainty, particularly for vulnerable species like Kittiwakes and Fulmars, where mortality rates may be underestimated.

Moreover, the siting of turbines within a recognised migratory corridor poses an additional risk, potentially creating a barrier along a primary flight path used by species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with the potential effects on species with relatively small global populations, have not been adequately assessed.

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

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

In summary, the unreliability of the assessment, marked by internal inconsistencies, methodological weaknesses, and insufficient evidence, leads to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

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

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

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

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

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

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 potential construction and pollution risks is insufficient and lacks the necessary detail to evaluate environmental effects adequately. The proposal entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not present fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that are to be established after consent, thus hindering any meaningful assessment of their adequacy or effectiveness.

This dependence on undefined future measures raises significant concerns, particularly in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and essential habitats that are at risk from sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, controlled, or monitored.

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

identified as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning to a post-consent phase, the application fails to allow for 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 determination stage.

From a regulatory standpoint, deferring critical environmental safeguards contradicts the requirements set forth by the Environmental Impact Assessment regime. Likely significant effects and mitigation must be evaluated before consent, and the absence of this information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the combination of undefined mitigation measures, the absence of detailed management plans, and uncertainty regarding potential impacts results in a materially deficient assessment. These failings prevent a thorough evaluation of construction and pollution risks and further affirm that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents significant shortcomings in its assessment of fisheries and marine life, failing to adequately evaluate both ecological and socio-economic impacts. There is a critical lack of evidence regarding the potential for fishing activities to be displaced without adverse consequences. Specifically, the application does not demonstrate the availability or accessibility of alternative fishing grounds that could sustain additional pressure, which raises concerns about the risk of overfishing in other areas and the economic repercussions for the local fishing fleet.

Furthermore, the proposal poses substantial risks to marine species due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances that affect a wide area, notably impacting local species such as dolphins. The predicted disturbance to a significant segment of the bottlenose dolphin population raises urgent concerns; however, the application minimises the importance of these effects, lacking sufficient evidence to support its claims.

The inconsistencies within the application are also troubling. While it acknowledges the necessity of licenses for any harm to European Protected Species, it simultaneously categorises these impacts as negligible. This contradiction calls into question the validity of the assessment and highlights potential non-compliance with the Habitats Regulations, particularly where harm is anticipated that may require legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of

fishing activities. Without an integrated 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 the National Planning Framework 4 and the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, thus precluding any conclusion that the proposal embodies sustainable development.

In summary, the deficiencies related to fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies result in an incomplete and unreliable assessment. These issues inhibit a thorough evaluation of the impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to environmental quality, cultural identity, and tourism. The proposed development would introduce permanent red aviation lighting that would create a continuous and intrusive wall of light across the western horizon. This change would fundamentally alter the night-time environment.

There is no assessment of how this lighting would impact visual amenity, landscape character, or the experiences of residents and visitors. This is particularly important given the value of dark skies to local identity and the growth of sectors such as astro-tourism. The lack of consideration for these impacts highlights a clear gap in the overall landscape and environmental assessment.

Moreover, the application fails to evaluate the effects on nocturnal wildlife, which is a significant oversight. Species like Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are highly sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The absence of a lighting impact assessment or a phototaxis study means that the potential effects of aviation lighting on these species and their mortality rates are not addressed.

The reliance on daytime survey data in the ornithological assessment does not adequately capture nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk from disorientation caused by artificial lighting, yet this has not been assessed. Without site-specific night-time data, understanding the ecological impacts is severely limited.

The lack of an assessment for nocturnal impacts makes it impossible to determine whether protected species or designated sites would be adversely affected. The evidential standard necessary to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, which engages the precautionary principle and prevents a lawful determination.

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the protection of natural places and environmental quality. They also undermine a comprehensive 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 creates a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis renders the application incomplete and unable to support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development as outlined by statutory duties and national policy. It echoes the primary concerns that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was highlighted. Despite now being framed within a more robust policy context that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, the current application has not satisfactorily addressed these issues.

Critical gaps are evident in the evidential basis provided for assessment. The use of an undefined design envelope is troubling, and the application relies on unspecified mitigation measures while omitting essential impact pathways, such as those affecting nocturnal wildlife, the full extent of onshore infrastructure, and tourism implications. Consequently, the Environmental Impact Assessment lacks completeness, which hinders a thorough understanding of likely significant effects or residual impacts.

Procedural shortcomings are also apparent. Notably, the absence of a compliant Island Communities Impact Assessment constitutes a breach of statutory obligations under the Islands (Scotland) Act 2018. Additionally, the failure to disclose the full Social Impact Assessment signifies a substantial omission. These inadequacies inhibit the competent authority from evaluating impacts on community wellbeing, cultural identity, and economic resilience, ultimately rendering the application unsuitable for determination.

The proposal conflicts with the National Planning Framework 4. It does not adequately protect biodiversity, natural areas, and cultural heritage, nor does it demonstrate that health and wellbeing effects are acceptable. The absence of tourism impact modelling further clouds the assertion of net economic benefit. Moreover, there has been insufficient assessment of the cumulative impacts from both offshore and onshore components, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold

needed to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

Significant and irreversible alterations to a highly sensitive landscape would also arise from this proposal. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, disruptions to cultural and visual connections, and repercussions on tourism represent enduring effects that cannot be mitigated to an acceptable standard.

In summary, the application is procedurally and substantively unfit for determination. The considerable deficiencies in information, coupled with policy conflicts and unresolved environmental risks, impede a lawful and evidence-based decision. Therefore, it is requested that the application for the Spiorad na Mara Offshore Wind Farm be refused in its entirety.

Additional Comments

I have been lucky enough to spend extended time on the Isle of Lewis, participating in art residencies, touring and sailing around it, on multiple occasions. Experiencing the islands incredible landscapes, night skies and wildlife have had a deep impact on me, and been a great inspiration to my art practice, as well as improving my wellbeing long after I have left the island. Great Britain has very few places as unspoilt as Lewis and, whilst I am a supporter of renewable energy, I strongly feel the proposed wind farms will ruin a place of incredible importance and cause great damage to the wildlife in the area. Please listen to the people who are writing to stop the project, we care deeply that this area remain a place of unspoilt outstanding natural beauty, where nature and wildlife thrive and people can experience the wonders of the dark skies. We owe it to current and future generations not to destroy such a magical place.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 4E8D2E82

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 regulations. The objection is based on a review of the Environmental Impact Assessment Report and its supporting documentation, highlighting material deficiencies in planning, environmental considerations, cultural aspects, and procedural elements. The wind farm is proposed off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The proposal raises fundamental concerns regarding its compatibility with statutory requirements, national policy, and the principles of sustainable development due to its scale, proximity, and design.

The application does not present a sufficient evidential basis for lawful determination. It lacks critical environmental data, with baseline information being limited and inconsistent, and significant aspects of the proposal are undefined. A flexible design framework complicates the assessment of likely significant effects, while the reliance on unspecified mitigation measures leaves their effectiveness unassessed. 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 evidence.

There are evident policy conflicts within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that national obligations to protect biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts directly challenge the statutory tests required for consent and hinder the competent authority's ability to determine that the development meets policy standards.

The scale of the project is unprecedented for this area, with large turbines situated close to the shoreline, raising significant issues about landscape capacity, visual dominance, and environmental impact. Overall, the lack of sufficient information, the 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 factors, the precautionary principle should apply.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of the marine ecology and protected species is fundamentally flawed, resulting in an incomplete understanding of the ecological receptors in the West Lewis

coastal environment. This area is biologically active and highly sensitive, yet the methodologies applied do not adequately capture crucial details regarding species presence, behaviour, and habitat use. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

Among the significant gaps is the treatment of 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. By failing to assess their core foraging range and behavioural patterns, the potential effects of construction-related disturbances, noise, and increased activity remain unexamined. This oversight undermines any conclusions drawn about the absence of significant effects on otters.

Moreover, the evaluation of basking sharks reveals further shortcomings. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic weather conditions, likely leading to an underestimation of their presence. This is in stark contrast to established land-based observations, which indicate that these waters are frequently utilised by the species. The neglect to incorporate or adequately consider such data contributes to an incomplete baseline, which in turn diminishes the reliability of the conclusions drawn.

The methodological limitations present in the assessment result in conclusions regarding negligible or non-significant effects that are based more on assumptions than on solid evidence. The lack of sufficient baseline data hinders a meaningful evaluation of cumulative and indirect impacts, including those associated with seasonal variations and interactions within the wider ecosystem. This uncertainty raises questions about the actual risks to marine species and habitats.

From a regulatory standpoint, the application fails to comply with the requirements set by the Environmental Impact Assessment regime and National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty precludes the ability to dismiss adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these circumstances, it is evident that consent cannot be lawfully granted.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These significant deficiencies hinder a thorough evaluation of impacts on marine ecology and protected species, leading to the conclusion that the application does not provide a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment associated with the development is fundamentally flawed, characterised by significant gaps in evidence and internal inconsistencies that undermine its conclusions. The application fails to demonstrate to the required evidential standard that internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will not be adversely

affected. Key foraging areas and migratory pathways are located within the project area, yet the assessment does not thoroughly evaluate the implications of potential displacement, collision risk, or habitat loss.

There exists a contradiction in the application, as the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is necessary only when significant harm is anticipated. This inconsistency raises doubts about the reliability of the assessment and suggests that the conclusions drawn are unsupported by the evidence provided. The assessment lacks sufficient proof that seabirds linked to protected sites such as the Lewis Peatlands and St Kilda will remain unaffected. It inadequately accounts for the significance of these feeding grounds, relying on modelling methods that introduce uncertainty, particularly for species like Kittiwakes and Fulmars, which are already in severe decline. The methodologies employed are likely to underestimate mortality rates, especially when baseline data is lacking and behavioural responses are not fully understood.

The placement of turbines within a recognised migratory corridor creates an additional and significant risk, functioning as a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application fails to adequately consider the long-term consequences of sustained mortality within this corridor or the potential impacts on species with relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold needed to conclude no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, alongside data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This engages the precautionary principle and prevents a lawful conclusion that would support consent. Furthermore, the identified deficiencies represent a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is unreliable due to its internal inconsistencies, methodological shortcomings, and insufficient evidence. These deficiencies hinder a comprehensive evaluation of the impacts and lead to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines near the West Lewis coastline would fundamentally alter the landscape. This area is characterised by its open Atlantic horizon, undeveloped nature, and strong sense of remoteness. The assessment of the potential seascape, landscape, and visual impacts is deficient. It fails to represent the scale of change or the sensitivity of the environment adequately. The turbines would create a continuous industrial presence that would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity

and eroding the naturalness and remoteness of the region.

Methodological concerns exist regarding the selection and presentation of visual viewpoints. It appears that some viewpoints may not accurately reflect the most sensitive receptors or worst-case scenarios, particularly concerning key cultural heritage sites and valuable landscapes. This may lead to an understatement of the visual impact, compromising the reliability of the assessment.

Moreover, the assessment overlooks the interconnected relationship between the landscape, seascape, and cultural heritage. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are linked visually and spatially to the Atlantic horizon. Treating these sites as isolated assets neglects their interdependence and leads to an incomplete evaluation of the impacts on their cultural significance and setting. The proposed industrialisation of the seascape would sever these connections, disrupting how heritage assets are experienced in relation to the natural horizon. This change represents a broader cultural and spatial harm that the application has not adequately addressed.

From a policy standpoint, the proposal conflicts with National Planning Framework 4 regarding the protection of natural areas and historic assets. The magnitude of change is incompatible with requirements to safeguard landscape character and visual amenity as well as the setting of culturally significant sites. The lack of a robust worst-case scenario assessment undermines any claim of compliance with policy.

Additionally, the identified impacts cannot be effectively mitigated. The height, scale, and proximity of the turbines would ensure that their presence is dominant and unavoidable. The resulting changes would be fundamental and permanent, rather than manageable to acceptable levels through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal for construction within a high-energy Atlantic environment necessitates substantial seabed preparation and installation works, yet it lacks comprehensive Construction Environmental Management Plans and Pollution Prevention Plans. The application instead depends on the development of mitigation and contingency measures after consent has been granted, which limits any effective assessment of their potential adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns, particularly in relation to the sensitivity of the receiving environment. The West Lewis coastline is characterised by clean coastal waters and important habitats that are susceptible to disturbances from sediment and contamination. While the application

acknowledges risks associated with sediment mobilisation and the possibility of accidental chemical or oil spills, it does not adequately detail preventive, control, or monitoring measures.

Moreover, there is uncertainty regarding the behaviour and scale of sediment plumes resulting from seabed disturbances and cable installation. Without robust modelling and clearly defined management strategies, assessing the extent, duration, or ecological consequences of these impacts becomes impossible. This uncertainty also pertains to the potential effects on marine species and habitats that have already been identified as sensitive in the broader context.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application obstructs the evaluation of whether sufficient safeguards are in place to address pollution incidents. This deferral introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures prior to making a determination.

From a regulatory standpoint, the deferral of essential environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. Significant effects and corresponding mitigation must be evaluated before consent is granted, and the absence of this information precludes a lawful determination. Furthermore, the application fails to demonstrate adherence to policy requirements concerning environmental protection and water quality.

In conclusion, the failure to define mitigation measures, the inadequacy of detailed management plans, and the uncertainty surrounding potential impacts collectively render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks, reinforcing the assertion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a concerning contradiction regarding the potential harm to European Protected Species, where the need for licences is recognised while simultaneously describing impacts as negligible. This inconsistency raises significant doubts about the validity of the assessment and questions compliance with the Habitats Regulations, especially in cases where harm is expected to necessitate legal authorisation.

Moreover, the assessment of fisheries and marine life is inadequate, failing to deliver a thorough analysis of both ecological and socio-economic effects. The waters off the West Lewis coast are home to a rich marine ecosystem and a vibrant fishing industry, yet there is no demonstration that these vital uses and habitats can be safeguarded without serious disruption. A key issue is the erroneous assumption that fishing activities can be relocated without adverse consequences. The application lacks evidence indicating that alternative fishing grounds exist, are accessible, or can withstand additional pressure. This gap is critical, as it poses risks of overfishing in

other areas and could have broader economic repercussions for the local fishing fleet.

There is also a significant oversight in evaluating cumulative impacts from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a thorough examination of these combined effects, it is impossible to ascertain the overall implications for marine ecosystems and socio-economic conditions. The proposal is set to introduce considerable risks to marine species, particularly through construction-related underwater noise. The use of high-energy hammer piling over extended durations is expected to disturb marine life across wide areas, with potential adverse effects on species like dolphins. The anticipated disturbance to a substantial portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays these effects without adequate supporting evidence.

Additionally, from a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or avoid significant negative impacts on marine biodiversity, which hampers any assertion that the proposal constitutes sustainable development.

In conclusion, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These shortcomings obstruct a comprehensive evaluation of the potential impacts on marine life and fisheries.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm signifies a significant failure to meet the standards of sustainable development as required by statutory duties, national policy, and evidential criteria. This application echoes the principal issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Presenting this application under a stronger policy framework, which emphasises the importance of biodiversity, peatland conservation, landscape integrity, and community welfare, does not mitigate these concerns.

The evidential basis for the application remains incomplete and unreliable. There are crucial gaps in the baseline data, the design envelope remains undefined, and reliance on unspecified mitigation measures raises significant concerns. Key impact pathways have been omitted from the assessment, including effects on nocturnal wildlife, comprehensive onshore infrastructure, and potential tourism impacts. Consequently, the Environmental Impact Assessment lacks completeness, hindering a thorough understanding of likely significant effects and residual impacts.

Moreover, procedural deficiencies are evident. The lack of a compliant Island Communities Impact Assessment is a breach of statutory obligation under the Islands (Scotland) Act 2018. Additionally, the failure to provide a complete Social Impact

Assessment represents a significant omission, limiting the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic stability, thus rendering the application unsuitable for determination.

The proposal is also at odds with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural environments, and cultural heritage, fails to establish that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to insufficient tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been properly evaluated, obscuring the implications for peatlands, carbon balance, habitats, and crofting land.

There remains uncertainty around environmental risks, which may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and contain inconsistencies. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and precluding a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The considerable information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful, evidence-based decision. It is imperative that the competent authority refuse consent on these grounds or utilise the appropriate regulatory provisions to mandate the submission of the outstanding information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 0266C3FC

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the Spiorad na Mara Offshore Wind Farm, which has been submitted under marine licensing and Environmental Impact Assessment frameworks. It arises from an examination of the Environmental Impact Assessment Report and accompanying documents, revealing significant shortcomings in planning, environmental considerations, cultural aspects, and procedural integrity. The proposed development is situated off the western side of the Isle of Lewis, an area noted for its Atlantic-facing coast, near-pristine surroundings, and strong cultural significance. Concerns regarding the scale, proximity, and design of the project fundamentally challenge its adherence to statutory obligations, national policies, and sustainable development principles.

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant shortcomings, failing to offer a comprehensive, transparent, or dependable account of the potential environmental consequences of the proposal. The flexible Project Design Envelope, which lacks concrete commitments regarding turbine dimensions, layouts, or configurations, introduces considerable uncertainty. This lack of specificity undermines the integrity of the assessment process, resulting in a presentation of impacts that may not accurately represent the final development. Consequently, both the public and the competent authority are left without a clear understanding of the true environmental effects.

Moreover, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that remain undefined. By seeking consent on the premise that environmental harm will be mitigated at a later stage, the application precludes any meaningful evaluation of the proposed measures' effectiveness or a proper assessment of residual impacts. This deferral of essential information to post-consent stages contravenes the intent of the Environmental Impact Assessment regime, which necessitates that significant effects and their mitigations are clearly outlined prior to decision-making.

Evidential deficiencies abound, including inadequate baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. Such gaps lead to uncertainties concerning the magnitude and significance of impacts, especially where conclusions of negligible or non-significant effects are put forth without solid supporting data. This insufficiency of information obstructs a clear understanding of cumulative and worst-case impacts, fostering scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not meet the evidential requirements under the Habitats Regulations to dismiss adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly with respect to protected species and sensitive habitats. Additionally, the proposal fails to demonstrate alignment with National Planning Framework 4, especially regarding biodiversity protection and environmental integrity, as it does not substantiate that impacts have been fully assessed or that appropriate safeguards are in place.

In summary, the combination of an undefined design envelope, the absence of specified mitigation strategies, and significant gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies hinder a lawful and thorough evaluation of environmental effects, leaving the competent authority unable to make an informed decision based on the provided information.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species within the West Lewis coastal environment is fundamentally inadequate. This marine system is both sensitive and biologically active, yet the baseline data provided is insufficient, and the

methodologies employed do not effectively capture the presence, behaviour, and habitat usage of species. Consequently, there is no solid evidential foundation for evaluating potential impacts.

A significant oversight pertains to otters, which are classified as a European Protected Species. The application fails to adequately recognise and assess their active use of coastal areas for foraging and movement. Without considering their core foraging range and behavioural patterns, the assessment neglects to evaluate the potential impacts of construction disturbance, noise, and increased activity. This gap undermines any claims of negligible effects on this species.

Moreover, the assessment of basking sharks suffers from substantial deficiencies. The reliance on aerial surveys leads to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents their presence, especially when compared to established land-based observations that show frequent use of these waters. By not properly incorporating such data, the assessment presents an incomplete baseline and weakens the validity of its conclusions.

These methodological shortcomings result in claims of negligible or non-significant effects being based on mere assumptions rather than solid evidence. The lack of sufficient baseline data hampers a meaningful evaluation of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions, introducing uncertainty about the real risks facing marine species and habitats.

From a regulatory standpoint, the application fails to comply with the Environmental Impact Assessment regime and National Planning Framework 4. The necessary identification and assessment of protected species are lacking, leading to a level of uncertainty that prevents the exclusion of adverse effects beyond reasonable scientific doubt. As such, the precautionary principle is engaged, and consent cannot be lawfully granted.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application does not possess a sufficient evidential foundation.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The West Lewis coastline is a vibrant cultural landscape where the environment, language, traditions, and community are intricately linked. However, the assessment of cultural heritage and community identity is fundamentally inadequate. It adopts a reductive approach, treating heritage merely as a collection of 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

mischaracterised as static features, despite being active places of burial and spiritual practice. This oversight neglects their continued use and meaning, as well as the potential impact of development on their settings. Consequently, the cultural effects have not been adequately evaluated, disregarding the essential role these sites play in community life.

The assessment also overlooks intangible cultural heritage, including the Gaelic language and traditions that are essential to the area's identity. This omission represents a significant failure, as these elements are vital for understanding the full cultural impact of the proposed development.

Moreover, there are serious concerns regarding community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity, recognised as characteristics of an Indigenous People. Yet, no Free, Prior and Informed Consent process has been implemented. This lack of meaningful engagement undermines the validity of the assessment and fails to align with established principles of participation in decisions that affect cultural and environmental interests.

Another critical issue is the absence of a compliant Island Communities Impact Assessment, which is required under the Islands (Scotland) Act 2018. The lack of this assessment prevents the competent authority from fulfilling its legal duty to evaluate the social, cultural, and economic impacts on the island community. This omission alone undermines the lawful determination of the proposal.

From a policy standpoint, these deficiencies contradict National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to account for both tangible and intangible heritage, along with the lack of recognition of living cultural practices, represents a clear departure from policy obligations.

In summary, the failure to adequately assess living heritage, intangible cultural value, community rights, and compliance with statutory requirements results in a significant evidential gap. The cultural impacts of the development remain improperly evaluated, leaving the application without a sufficient basis for understanding the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

Moreover, the perception of the proposal as a threat to community identity and

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns regarding the assessment of construction and pollution risks, which is notably incomplete and lacks the necessary detail to evaluate potential environmental effects. It entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet the absence of fully developed Construction Environmental Management Plans or Pollution Prevention Plans is troubling. Instead, the application depends on mitigation and contingency measures that are to be prepared after consent, thereby hindering any meaningful assessment of their adequacy or effectiveness.

Particularly alarming is the reliance on undefined future measures in light of the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are at risk from sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and the possibility of chemical or oil spills, it fails to offer sufficient detail on the prevention, control, or monitoring of these risks.

Further compounding these issues is the uncertainty surrounding the scale and behaviour of sediment plumes generated by seabed disturbance and cable installation. In the absence of robust modelling and well-defined management strategies, it is impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty also affects potential effects on marine species and habitats recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these concerns. By postponing contingency planning until after consent, the application obstructs an evaluation of whether adequate safeguards are established to address pollution incidents. This introduces procedural risk and undermines the capacity of the competent authority to assess environmental protection measures at the point of decision-making.

From a regulatory standpoint, the deferral of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. Likely significant effects and necessary mitigation must be evaluated prior to consent, and the absence of this information renders a lawful determination impossible. Additionally, the application fails to demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the shortcomings related to the lack of defined mitigation measures, detailed management plans, and uncertainties regarding potential impacts render the assessment materially deficient. These deficiencies hinder a thorough evaluation of construction and pollution risks and reinforce the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries within the application is notably inadequate, failing to present a thorough analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are known to host a vibrant marine ecosystem alongside a thriving fishing industry. However, the application does not adequately demonstrate how these critical habitats and activities will be preserved or sustained in the face of proposed developments without incurring significant disruption.

A critical concern arises from the presumption that fishing activities can be relocated without adverse effects. The absence of evidence to support the availability, accessibility, and capacity of alternative fishing grounds is a considerable oversight. This lack of information is particularly troubling, as it poses risks of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal raises significant risks to marine species, especially due to the underwater noise produced during the construction phase. The anticipated high-energy

hammer piling over an extended period is likely to disrupt marine life across considerable distances, with particular concern for species such as dolphins. The expected disturbance to a notable segment of the local bottlenose dolphin population is alarming, yet the application diminishes the importance of these effects without adequate supporting evidence.

The application also presents inconsistencies by acknowledging the necessity for licences to allow harm to European Protected Species while simultaneously deeming the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when anticipated harm necessitates legal permission.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A failure to comprehensively evaluate these cumulative effects leaves the overall impact on marine ecosystems and socio-economic conditions indeterminate.

From a policy perspective, the application does not convincingly demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It falls short of proving that the development can coexist with established marine users or that it can mitigate unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies of the application result in an incomplete and unreliable assessment. These shortcomings obstruct any robust evaluation of the potential effects on marine life and fisheries.

TOURISM

The assessment of tourism impacts within the application is materially deficient, neglecting to evaluate the economic and social consequences for a vital sector of the Isle of Lewis economy. Tourism, which has seen substantial growth from £65 million in 2017 to over £81.5 million, supports more than 1,000 jobs and accounts for up to 16% of the island's economy, relies fundamentally on the area's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. The application itself acknowledges that 86% of visitors are attracted by scenery, yet it does not provide a quantified assessment of how large-scale offshore infrastructure might influence visitor numbers, behaviour, or the overall economic contribution to the area.

Moreover, the assessment fails to consider the crucial role of environmental quality in enhancing tourism. It overlooks the significance of unspoiled landscapes and dark skies for the visitor experience and emerging markets, such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a substantial gap in understanding the impacts on this growing aspect of the local economy.

In light of the island community's limited economic diversification, the failure to assess impacts on tourism carries broader implications for employment, local businesses, and community sustainability. The absence of a compliant Island Communities Impact Assessment means that these economic vulnerabilities have not been evaluated in accordance with the requirements set out in the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, assessing environmental drivers of visitor behaviour, and recognising the island's economic dependency lead to a significant evidential gap. This gap hinders a robust evaluation of economic effects and supports the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application brings forth the same core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was evident. Although the current application is presented under a more robust policy framework, it places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

A reliable and comprehensive evidential basis for determination is notably lacking in the application. Critical gaps exist in the baseline data, the design envelope remains undefined, and there is an over-reliance on unspecified mitigation measures. Key impact pathways are omitted, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of significant effects or residual impacts.

Procedural inadequacies are also present. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations set out in the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission. These gaps obstruct the competent authority from assessing the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

This proposal stands in direct opposition to 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 and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative

impacts of offshore and onshore components have not been properly assessed, obscuring the effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The assessments related to marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also exhibit internal inconsistencies. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thus invoking the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I live near the proposed substation site for this development with my husband and I have extreme concerns about the health and well being of my family and I. The community DO NOT consent to this mass industrialisation of our island home. Being used as guinea pigs is deeply distressing for the entire island population when the affects of what these monstrous turbines will have on our health and wellbeing are completely unknown. It truly feels like something out of a Hollywood blockbuster horror film.

The environmental damages to our highly protected and peaceful landscape will be devastating. It's staggering to see the amount of laws that will be broken if this goes ahead, which doesn't seem to have even been given a second thought.

I am a young Gaelic speaker, recently married who has chosen to stay and make a life here with the hope to raise a family. However if these proposals go ahead, we will have to consider leaving the island, robbing our future children of the wonderful Island upbringing we ourselves experienced.

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: D1BA3457

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 frameworks. The objection is founded on a thorough review of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural implications, and procedural integrity. Located off the west coast of the Isle of Lewis, the development is situated in an area renowned for its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The design, scale, and proximity of the proposed development raise serious concerns about its compliance with statutory obligations, national policy, and sustainable development principles.

There is an alarming lack of a sound evidential foundation within the application, as critical environmental data is absent, baseline information remains limited and inconsistent, and essential components of the proposal are not defined. The flexible design framework undermines the ability to assess likely significant effects, while the reliance on unspecified mitigation measures hampers any evaluation of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidence to support them.

The proposal presents clear and serious policy conflicts, appearing at odds with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly undermine the statutory tests necessary for consent and cast doubt on the ability of the competent authority to deem the development acceptable from a policy perspective.

The unprecedented scale of the proposal, with large turbines positioned perilously close to the shoreline, raises significant issues regarding landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, reliance on undefined mitigation strategies, evidential deficiencies, and apparent policy non-compliance illustrates that the application is fundamentally incomplete and incapable of securing a lawful determination. Given these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application heavily relies on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach seeks consent based on the premise that any environmental harm will be addressed post-consent, which obstructs a thorough evaluation of their effectiveness or the assessment of residual impacts. Such deferral of essential information to later stages is procedurally unacceptable and contradicts the fundamental purpose of the Environmental Impact Assessment regime, which mandates that significant effects and mitigation must be clearly established before determination.

Additionally, the Environmental Impact Assessment Report is materially deficient, lacking a full, transparent, or reliable account of the proposal's likely environmental effects. The use of a flexible Project Design Envelope, which does not commit to specific turbine dimensions, layouts, or configurations, injects significant uncertainty into the assessment process. This ambiguity undermines the integrity of the evaluation and means that the impacts presented may not correspond to the actual development, thus inhibiting both public understanding and the competent authority's ability to grasp the true extent of environmental effects.

The report also presents significant evidential deficiencies. There are noticeable gaps in baseline data, limitations in methodology, and a reliance on assumptions rather than site-specific evidence. This results in uncertainty regarding the scale and significance of impacts, particularly when conclusions of negligible or non-significant effects are made without adequate supporting data. The lack of comprehensive information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that does not align with statutory requirements.

Consequently, the application does not satisfy the evidential threshold needed under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, including the need for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been comprehensively assessed or that suitable safeguards are established.

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

ASSESSMENT OF ALTERNATIVES

The proposed application does not adequately assess alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of providing a structured and reasoned comparison of realistic alternatives based on

environmental effects, it presents a narrative account of project evolution. This method does not demonstrate that the developer has properly identified, assessed, and selected less harmful options in preference to more damaging solutions.

Moreover, there is a lack of transparent and evidence-based comparisons of alternative offshore locations, development scales, or design configurations. Notably, the application does not indicate that the possibility of placing turbines further offshore has been seriously considered, where it is likely that visual, ecological, and coastal impacts would be reduced. The sensitivity of the West Lewis coastline and the importance of proximity to shore in determining impact highlight the need for such analysis. The failure to include this information prevents any conclusion that the proposed siting represents the least damaging option.

These shortcomings also apply to cable routing and landfall assessment. Insufficient evidence is provided to show that alternative routes have been adequately explored to avoid or minimise impacts on sensitive receptors, including areas of cultural and spiritual significance like Barvas Cemetery. The absence of a clear avoidance strategy and a lack of comparative analysis suggest that mitigation by design has not been implemented, relying instead on post-design mitigation measures.

Consequently, the application does not demonstrate that environmental harm has been minimised through site selection, layout, and infrastructure routing. This lack of adherence to the established mitigation hierarchy hinders the competent authority's ability to ascertain whether less harmful and more appropriate alternatives exist. 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 compromises compliance with National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment constitutes a material omission, contributing to the overall conclusion that the application has not been adequately assessed and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The application exhibits significant deficiencies in the assessment of marine ecology and protected species, failing to provide a complete and reliable understanding of ecological receptors in the West Lewis coastal environment. This area is recognised as a highly sensitive and biologically active marine system. However, the baseline data is inadequate, and the methodologies employed do not effectively capture the presence, behaviour, and habitat use of key species. Consequently, there is a lack of a sound evidential basis for evaluating potential impacts.

One notable shortcoming pertains to otters, a European Protected Species, as the application does not adequately acknowledge or assess their active use of coastal areas for foraging and movement. The failure to consider their core foraging range and

behavioural patterns has led to an insufficient assessment of the potential effects arising from construction disturbance, noise, and increased human activity. This oversight undermines the conclusions regarding the absence of significant effects on this species.

In addition, the assessment of basking sharks is flawed due to an over-reliance on aerial surveys, which introduce significant detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate the presence of basking sharks, especially when compared to established land-based observations that indicate their frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline, undermining the reliability of the conclusions reached.

These methodological limitations mean that the conclusions drawn, stating negligible or non-significant effects, are based on assumptions rather than robust evidence. The lack of sufficient baseline data also hampers a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This introduces uncertainty regarding the actual scale of risk posed to marine species and habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application presents significant deficiencies, particularly regarding the evidential standards necessary to establish that there will be no adverse effects on protected sites. The reliance on contradictory conclusions within the assessment raises serious concerns about its reliability. The development site is situated within crucial foraging areas and migratory pathways for internationally important seabird populations that are already in decline. However, the application does not adequately assess the risks of displacement, collision, or habitat loss. Furthermore, the evidence provided does not convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected.

The methodologies employed appear to underestimate mortality rates due to incomplete baseline data and a lack of understanding of species-specific behavioural

responses, particularly for vulnerable species like Kittiwakes and Fulmars. The presence of wind turbines within a recognised migratory corridor poses a significant risk by creating a barrier in a primary flight path used by birds migrating between the United Kingdom and Iceland. The assessment fails to thoroughly evaluate the long-term impacts of sustained mortality within this corridor and does not adequately address the consequences for species with small global populations.

From a regulatory standpoint, the application does not achieve the evidential threshold needed to conclude no adverse effect on the integrity of protected sites. The inconsistencies and data gaps present within the assessment violate the standards required to demonstrate beyond reasonable scientific doubt, engaging the precautionary principle, which ultimately undermines the possibility of a lawful conclusion in support of consent.

In addition, the failure to comply with the National Planning Framework 4 regarding biodiversity protection and the preservation of natural assets is evident. The inability to provide sufficient evidence that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. Collectively, these shortcomings render the assessment unreliable due to its internal inconsistencies, methodological weaknesses, and insufficient evidential support, leading to the conclusion that the application does not meet the necessary statutory requirements for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The proposed development lacks a robust assessment of cultural heritage and community identity, particularly in its failure to recognise the West Lewis coastline as a vibrant cultural landscape. This area is characterised by an intricate relationship between environment, language, tradition, and community. The application adopts a narrow perspective, viewing heritage merely as isolated and static assets, rather than acknowledging their active social, cultural, and spiritual significance within the community.

Central to the deficiencies identified are the culturally important sites, including the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment regards them as static features. This oversight neglects their ongoing use and meaning, as well as the implications of the proposed development on their setting, leading to an inadequate evaluation of cultural impacts and a disregard for their integral role in community life.

The assessment also fails to account for intangible cultural heritage, which encompasses the Gaelic language, local traditions, and the enduring connection between the community and the coastal environment. These vital elements are crucial to the identity of the area, but their absence from the assessment signifies a significant gap. Without integrating these aspects, the true cultural implications of the development remain obscured.

Moreover, there are critical concerns regarding community rights and engagement. The Gaelic-speaking population, recognised for its unique cultural identity as an Indigenous People, has not been afforded the process of Free, Prior and Informed Consent. This lack of meaningful engagement raises questions about the legitimacy of the assessment and does not align with established principles regarding participation in decisions that impact cultural and environmental interests.

A notable procedural shortcoming is the omission of a compliant Island Communities Impact Assessment, which is mandated by the Islands (Scotland) Act 2018. Without this required assessment, the competent authority is unable to fulfil its legal obligation to evaluate the social, cultural, and economic consequences for the island community. This gap alone hinders lawful decision-making.

From a policy standpoint, these shortcomings place the proposal at odds with the National Planning Framework 4, particularly regarding the preservation of historic assets and sites. The neglect to address both tangible and intangible heritage, alongside the failure to recognise living cultural practices, constitutes a clear deviation from policy stipulations.

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

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer's commissioning of a Social Impact Assessment, which included focus groups with local residents, has resulted in a significant evidential gap due to the non-publication of the full report. This lack of transparency impedes both public understanding and the competent authority's ability to assess the social risks highlighted in the developer's own research. Available summaries indicate that local residents are already experiencing measurable stress, anxiety, and concern related to the scale and proximity of the proposal. These impacts stem from direct engagement with the community and should not be considered speculative. However, the omission of the complete assessment restricts scrutiny of the findings and diminishes the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal appears to pose a direct threat to community identity and cohesion, as evidenced by the developer's acknowledgment of "cultural loss." Despite this recognition, these social impacts have not been adequately incorporated into the main application or given sufficient weight. The failure to disclose the full Social Impact Assessment obscures the true human and social costs associated with the development. This lack of transparency compromises the Environmental Impact Assessment process, as a comprehensive understanding of social, economic, and health impacts is crucial for projects of this scale, particularly those that may affect community character and functioning.

From a policy standpoint, the application does not demonstrate adherence to the National Planning Framework 4 regarding health and wellbeing. It is essential that developments support positive health outcomes and mitigate harm. However, the existing evidence indicates adverse effects that have not been fully communicated. Without access to the complete assessment, it is impossible to ascertain compliance with this policy.

The implications of these procedural oversights are substantial. The competent authority is unable to conduct a thorough socio-economic and health evaluation in the absence of the complete Social Impact Assessment. This represents a significant omission within the application and fails to meet the evidential requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, alongside documented existing adverse impacts, leads to an incomplete and unreliable assessment. This situation hinders lawful determination and underscores the inadequacy of the information supporting the application.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines close to the shoreline represents a significant threat to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. Such an industrial presence would create a continuous and dominant alteration to the landscape, leading to a permanent and irreversible transformation that undermines its character.

The application lacks a proper representation of the scale of the visual change that would occur. The height and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment fails to accurately reflect the level of impact and its significance within this sensitive landscape.

There are serious methodological issues regarding the selection and presentation of visual viewpoints. Evidence suggests 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 concerns that the magnitude of the visual impact has been understated, undermining the reliability of the overall assessment.

Moreover, the assessment does not adequately consider the interconnected relationship between seascape, landscape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked to the Atlantic horizon through visual and spatial connections. Treating these sites as isolated entities disregards their interdependence and leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and affecting their link to the natural horizon. This results not only in visual impacts but also in broader cultural and spatial harm that the application fails to assess adequately.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment seriously undermines 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 dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

Overall, the assessment fails to adequately represent the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and highlight that the proposal is incompatible with the protection of this invaluable landscape.

CONSTRUCTION AND POLLUTION RISKS

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

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

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

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

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

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

FISHERIES AND MARINE LIFE

The 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 proposal involves significant onshore works, including cabling across protected moorland and the construction of a substation near Stornoway, which necessitates access infrastructure through sensitive landscapes. These activities entail excavation in areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, obscuring the project's overall environmental footprint.

The assessment approach is fragmented, as it treats the offshore turbines and onshore works separately, failing to acknowledge the intrinsic link between these components. This separation prevents an accurate evaluation of the cumulative effects on peatlands, habitats, and local communities. The Environmental Impact Assessment process stipulates that all project components must be considered collectively; however, the current application neglects this essential requirement.

Moreover, the proposal poses significant risks to sensitive habitats, including machair systems and peatland environments that are protected under policy. There is no evidence demonstrating that the impacts on these habitats have been fully assessed or that effective avoidance measures have been implemented, leaving a glaring gap in biodiversity protection.

Concerns regarding carbon balance are also evident, as the disturbance of peatland may release stored carbon, leading to a carbon debt that contradicts the objectives of renewable energy development. The application does not sufficiently address this crucial issue or prove that the overall carbon balance remains beneficial.

Additionally, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the requisite consents or processes have been initiated, which casts doubt on the feasibility and lawful implementation of the project.

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

application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which are crucial to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally alter the night-time environment, yet the application fails to assess the impact of this lighting on visual amenity, landscape character, or the experience of both residents and visitors. This lack of evaluation is significant, particularly given the importance of dark skies to the area's identity and to the emerging sector of astro-tourism.

Equally concerning is the absence of any evaluation 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 result in disorientation and increased collision risks. The application lacks a lighting impact assessment or a phototaxis study, which means it does not consider how the proposed aviation lighting might affect these species or contribute to increased mortality rates. Furthermore, reliance on daytime survey data within the ornithological assessment fails to capture nocturnal activity or the associated risks, leaving species like Kittiwakes, which may forage or migrate at night, vulnerable to disorientation from artificial lighting without appropriate evaluation.

The absence of site-specific night-time data creates a significant gap in understanding ecological impacts. This lack of assessment makes it impossible to ascertain 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 preventing 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 also undermines the broader assessment of landscape and seascape impacts, as the character of the night-time environment is an integral part of the overall context. Collectively, 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 Spiorad na Mara Offshore Wind Farm proposal shows a failure to meet the requirements of sustainable development when examined against statutory duties, national policy, and evidential standards. This application repeats the core issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. This current proposal is presented under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for determination in this application is incomplete and unreliable. There are significant gaps in baseline data, an undefined design envelope is being used, and reliance on unspecified mitigation measures is evident. Additionally, there is an omission of key impact pathways, including effects on nocturnal wildlife, the full onshore infrastructure, and tourism. As a result, the Environmental Impact Assessment is insufficient and does not provide a clear understanding of likely significant effects or residual impacts.

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

There is direct conflict with National Planning Framework 4. The proposal does not demonstrate the protection of biodiversity, natural places, and cultural heritage. It fails to show acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative impact of offshore and onshore elements has not been adequately assessed, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some areas, inconsistent. The necessary evidential threshold to exclude adverse effects beyond reasonable scientific doubt has not been met, engaging the precautionary principle and preventing 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, disruption of cultural and visual relationships, and impacts on tourism will result in permanent effects that cannot be adequately mitigated.

Considering all these issues, the application is procedurally and substantively unfit for determination. The considerable 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 obtain the missing information.

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

Additional Comments

Where is the benefit for local residents who have their environment blighted by the sight of these huge turbines. Where is the protection for local wildlife and transitory species who use the seas off the coast of the Hebrides. What about the damage to fragile local environments associated with the connection to the national grid. What about the damage being caused to historic sites, which will now be spoilt by the site of turbines towering about these ancient structures. Would you build a wind turbine at Stone Henge? No, so why build them here, especially when they only serve to benefit overseas investors.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: BAB122AE

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted in accordance with the relevant marine licensing and Environmental Impact Assessment frameworks. A thorough review of the Environmental Impact Assessment Report and the associated documentation 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 characterised by its Atlantic-facing coastline, a near-pristine environment, and a strong cultural identity.

The application lacks an adequate evidential basis for a lawful determination. It is notable that critical environmental data is absent, baseline information is inconsistent and limited, and essential elements of the proposal remain undefined. The application's flexible design framework obstructs a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures means that their efficacy cannot be evaluated. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, with claims of negligible or non-significant effects not backed by robust evidence.

There are clear and significant conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements designed to protect biodiversity, climate interests, and environmental integrity. Such conflicts directly impact the statutory tests necessary for consent, ultimately undermining the ability of the competent authority to deem the development acceptable from a policy standpoint.

The scale of the proposed development is unprecedented for this area, with large turbines situated in close proximity to the shoreline, raising considerable concerns about landscape capacity, visual dominance, and environmental impact. When considering the lack of sufficient information, the 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 light of these issues, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally inadequate, failing to deliver a complete and transparent account of the potential environmental effects associated with the proposal. The flexibility of the Project Design Envelope, lacking a

commitment to specific turbine dimensions or configurations, introduces considerable uncertainty and undermines the possibility of applying a worst-case scenario consistently. This deficiency compromises the integrity of the assessment, obscuring the true environmental impacts and hindering both public understanding and the competent authority's ability to grasp the actual extent of effects.

The application's heavy reliance on undefined mitigation measures, monitoring strategies, and management plans, which remain unspecified, is concerning. Consent is sought with the premise that any environmental harm will be mitigated later, thus obstructing a meaningful evaluation of their effectiveness and any assessment of residual impacts. This postponement of crucial information to post-consent stages is procedurally unacceptable and contravenes the objectives of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to decision-making.

Additionally, there are considerable evidential gaps, including deficiencies in baseline data, methodological limitations, and an over-reliance on assumptions rather than site-specific evidence. Such shortcomings create uncertainty regarding the magnitude and significance of impacts, particularly when conclusions suggesting negligible or non-significant effects lack robust supporting data. The insufficient information leads to a failure to understand cumulative and worst-case impacts, introducing a level of scientific uncertainty that contradicts statutory requirements.

Consequently, the application does not meet the evidential threshold mandated by the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This scenario invokes the precautionary principle, especially concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate adherence to National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it fails to provide assurance that impacts have been comprehensively assessed or that adequate safeguards are in place.

In summary, the combination of an ill-defined design envelope, the absence of specified mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report both unreliable and incomplete. These critical deficiencies inhibit a lawful and robust evaluation of environmental effects, leaving the competent authority ill-equipped to make a determination based on the information submitted.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment related to marine ecology and protected species presents significant deficiencies and fails to deliver a comprehensive understanding of ecological receptors in the West Lewis coastal environment. This area is a biologically active and sensitive marine system, yet the baseline data remains incomplete. The methodologies used do not adequately capture the presence, behaviour, and habitat use of various species. Consequently, the assessment lacks a reliable evidential basis for evaluating potential impacts.

One critical shortfall is the treatment of otters, which are a European Protected Species. The application does not appropriately acknowledge or assess their active use of coastal areas for foraging and movement. The oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of potential effects from construction disturbances, noise, and increased activity. This gap undermines the conclusions concerning the absence of significant effects on this species.

There are also substantial shortcomings in the assessment of basking sharks, particularly due to the reliance on aerial surveys that introduce significant detection bias, especially in Atlantic conditions. This method is likely to underestimate the presence of these sharks, especially when compared to established land-based observations that show frequent use of these waters. The failure to include or properly consider such data results in an incomplete baseline and diminishes the reliability of the presented conclusions.

The methodological weaknesses mean that any conclusions regarding negligible or non-significant effects are based on assumptions rather than solid evidence. The lack of sufficient baseline data hinders a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty about the real scale of risk to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, given that protected species have not been properly identified or evaluated. The uncertainties introduced hinder the ability to exclude adverse effects beyond reasonable scientific doubt, thus invoking the precautionary principle. Under these circumstances, granting consent cannot be legally justified.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application for development presents a concerning lack of reliability stemming from its ornithological assessment, which contains significant gaps and inconsistencies. The assessment fails to provide adequate evidence that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline, will remain unaffected. Key foraging areas and migratory pathways crucial to these species have not been sufficiently evaluated regarding the risks of displacement, collision, or habitat loss.

Moreover, a fundamental contradiction arises within the application; the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, typically required only in anticipation of

significant harm. This inconsistency raises serious doubts about the credibility of the assessment and suggests that its conclusions are not substantiated by the available evidence.

The assessment's failure to address the importance of protected sites, such as the Lewis Peatlands and St Kilda, further highlights its deficiencies. The reliance on modelling approaches introduces considerable uncertainty, especially regarding species facing severe decline, like Kittiwakes and Fulmars. Methodologies used may underestimate mortality rates, particularly when baseline data is lacking and behavioural responses remain poorly understood.

The siting of turbines within a recognised migratory corridor poses a further significant risk, creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor have not been adequately assessed, nor has the potential impact on species with limited global populations.

From a regulatory standpoint, the application does not fulfil the evidential threshold necessary to affirm that there will be no adverse effects on the integrity of protected sites. The combination of contradictory conclusions, data deficiencies, and limitations in modelling means the standard of beyond reasonable scientific doubt has not been met. This raises the necessity to apply the precautionary principle, which inhibits a lawful conclusion in favour of consent.

Overall, the assessment is characterised by internal inconsistencies, methodological shortcomings, and a lack of sufficient evidence. These factors hinder a thorough evaluation of the potential impacts and collectively indicate that the application does not satisfy the statutory requirements essential for determination. Furthermore, the identified deficiencies are inconsistent with the National Planning Framework 4's stipulations on biodiversity protection and the safeguarding of natural assets. The proposal's inability to demonstrate that it will not adversely affect internationally significant seabird populations places it in direct opposition to national policy.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

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

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

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

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is crucial for developments of this magnitude, especially where community character and functioning are at stake. The absence of the full dataset means that the application does not provide a complete evidential basis for assessing the balance between benefits and harms.

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

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

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment concerning seascape, landscape, and visual impacts is significantly inadequate and does not properly address the extent of the anticipated change or the sensitivity of the affected environment. The coastline of West Lewis is characterised by an open Atlantic horizon, an undeveloped landscape, and a profound sense of remoteness. The proposed introduction of large-scale turbines in close proximity to the shore would impose a continuous and overwhelming industrial presence, fundamentally transforming this character and leading to a permanent and irreversible change to the landscape.

Moreover, the application fails to accurately depict the magnitude of the anticipated visual change. Given their scale and proximity, the turbines would dominate the views from residential areas, historic locations, and frequently visited coastal sites. This would adversely affect visual amenity and diminish the essential qualities of naturalness and remoteness. The assessment does not adequately communicate this level of impact or its significance within the context of such a sensitive landscape.

Concerns also arise regarding 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, particularly regarding significant cultural heritage sites and high-value landscapes. This raises the possibility that the assessment may have understated the magnitude of visual impact, thereby compromising the overall reliability of the evaluation.

A significant oversight is the failure to consider the interconnectedness between landscape, seascape, and cultural heritage. Notable sites, including the Calanais Standing Stones and other Scheduled Monuments, are integral to a broader landscape, interconnected by visual and spatial relationships to the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence and resulting in an incomplete evaluation of impacts on their context and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This 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 stands in direct conflict with National Planning Framework 4 regarding the preservation of natural places and historic assets. The extent of change proposed is inconsistent with the obligation to protect 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.

Additionally, it is evident that the identified impacts cannot be adequately mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Consequently, the resultant change is fundamental and permanent, incapable of being reduced to an acceptable level through mitigation measures.

Overall, the assessment does not accurately reflect the scale of impact, the sensitivity of the environment, or the interrelated nature of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is inconsistent with the safeguarding of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposal involves substantial seabed preparation and installation works in a high-energy Atlantic environment, yet the assessment of construction and pollution risks is incomplete. There are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans provided. 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.

Given the sensitivity of the receiving environment, this reliance on undefined future measures is particularly concerning. The West Lewis coastline 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 accidental chemical or oil spills, it fails to provide sufficient detail on prevention, control, or monitoring measures.

Uncertainty regarding the scale and behaviour of sediment plumes from seabed disturbance and cable installation further complicates the situation. Without robust modelling and clearly defined management strategies, it is impossible to determine the extent, duration, or ecological effects of these impacts. This uncertainty also extends to the potential effects on marine species and habitats identified as sensitive within the wider assessment.

The absence of detailed emergency response procedures exacerbates these issues. By deferring contingency planning to a post-consent stage, the application prevents an evaluation of whether appropriate safeguards are in place to respond to pollution events. This introduces procedural risk and undermines the authority's ability to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards conflicts with the requirements of the Environmental Impact Assessment regime. Likely significant effects and mitigation must be assessed before consent, and the lack of such information means 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 absence of defined mitigation measures, the lack of detailed management plans, and the uncertainty regarding potential impacts make the assessment materially deficient. These shortcomings hinder a robust evaluation of construction and pollution risks and support 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 adequately evaluate both ecological and socio-economic impacts. There is a critical lack of evidence regarding the potential for fishing activities to be displaced without adverse consequences. Specifically, the application does not demonstrate the availability or accessibility of alternative fishing grounds that could sustain additional pressure, which raises concerns about the risk of overfishing in other areas and the economic repercussions for the local fishing fleet.

Furthermore, the proposal poses substantial risks to marine species due to the underwater noise generated by construction activities. The anticipated high-energy hammer piling over an extended duration is expected to create disturbances that affect

a wide area, notably impacting local species such as dolphins. The predicted disturbance to a significant segment of the bottlenose dolphin population raises urgent concerns; however, the application minimises the importance of these effects, lacking sufficient evidence to support its claims.

The inconsistencies within the application are also troubling. While it acknowledges the necessity of licenses for any harm to European Protected Species, it simultaneously categorises these impacts as negligible. This contradiction calls into question the validity of the assessment and highlights potential non-compliance with the Habitats Regulations, particularly where harm is anticipated that may require legal authorisation.

Moreover, the assessment neglects to consider cumulative impacts arising from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. Without an integrated 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 the National Planning Framework 4 and the National Marine Plan. It fails to establish that the proposed development can coexist with existing marine users or avert unacceptable impacts on marine biodiversity, thus precluding any conclusion that the proposal embodies sustainable development.

In summary, the deficiencies related to fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies result in an incomplete and unreliable assessment. These issues inhibit a thorough evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application involves significant onshore infrastructure works, including cabling across protected moorland and the construction of a substation near Stornoway, which raises serious concerns. These works are linked to sensitive landscapes and require excavation in areas of deep peat, particularly within Barvas Moor, which serves as a crucial carbon store and ecologically sensitive habitat. However, the assessment provided is materially incomplete, failing to consider the full extent of impacts associated with the integrated nature of the project. By assessing offshore turbines and onshore elements separately, the application obscures the true scale of environmental and socio-economic effects.

The exclusion or deferral of onshore impact assessments hinders the ability to properly evaluate cumulative effects. The Environmental Impact Assessment process mandates a comprehensive evaluation of all project components, yet this disjointed approach prevents a full understanding of the combined impacts on peatlands, habitats, and local communities. This is particularly concerning given the risks to sensitive habitats, including machair systems and peatland environments that are under policy

protection. There is a clear evidential gap regarding biodiversity protection, as the application does not adequately demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been applied.

Moreover, the proposal raises pressing issues related to carbon balance. Disturbance of peatland may release stored carbon, potentially creating a carbon debt that contradicts the objectives of renewable energy initiatives. The application fails to address this crucial issue adequately or to show that the overall carbon balance remains beneficial.

Additionally, routing infrastructure through active croft land introduces potential conflicts with existing land use and legal rights. There is insufficient evidence indicating that the necessary consents or processes have been initiated, raising doubts regarding deliverability and lawful implementation of the project.

From a policy standpoint, the failure to assess the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests conflicts with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be avoided or mitigated further undermines the application's reliability. Consequently, the separation of project components, lack of comprehensive assessment, and absence of evidence on environmental and land use impacts render this portion of the application incomplete and untrustworthy, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal presents a significant evidential gap due to the absence of assessments concerning dark skies and nocturnal wildlife, which are crucial components of the Environmental Impact Assessment. The exceptionally dark skies of the West Lewis coastline contribute to the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, visible over long distances, is set to create a continuous and intrusive "wall of light" effect across the western horizon. This alteration of the night-time environment raises concerns regarding visual amenity, landscape character, and the experiences of residents and visitors.

Furthermore, there is a critical lack of evaluation regarding the impacts of this lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting due to their phototactic responses, which can lead to disorientation and increased risks of collision. The application notably lacks a lighting impact assessment or a phototaxis study, failing to address how the proposed aviation lighting may impact these vulnerable species or potentially raise mortality rates.

The shortcomings are exacerbated by the reliance on daytime survey data in the ornithological assessment, which does not adequately capture nocturnal activity or the associated risks. Kittiwakes, which may forage or migrate during the night, are similarly

at risk of disorientation due to artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates an essential gap in understanding the ecological impacts of the proposal.

As a result, it is impossible to ascertain whether protected species or designated sites would be adversely affected without a thorough assessment of nocturnal impacts. The application fails to meet the required evidential standard to exclude adverse effects beyond reasonable scientific doubt, engaging the precautionary principle and preventing a lawful determination.

In terms of policy, the omission contradicts the National Planning Framework 4 regarding the protection of natural places and environmental quality. Additionally, it undermines the broader assessment of landscape and seascape impacts, as the character of the night environment is an integral aspect of the overall ecological setting.

In summary, the absence of any assessment focused on dark skies and nocturnal wildlife reveals significant flaws in the application. The lack of baseline data, impact modelling, and species-specific analysis renders it incomplete, thus incapable of supporting a lawful determination.

TOURISM

The assessment of tourism impacts is critically inadequate and neglects to consider the economic and social ramifications for a vital sector of the Isle of Lewis economy. With tourism being intrinsically linked to the area's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness, the application's acknowledgement that 86% of visitors are attracted by scenery highlights a glaring oversight. It fails to provide a quantitative analysis of how large-scale offshore infrastructure may affect visitor numbers, behaviour, or the overall economic contribution that tourism makes to the island.

Tourism has experienced significant growth, escalating from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the island's economy. Nevertheless, the application does not examine how the industrialisation of the seascape and degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such critical analysis, it remains uncertain whether the proposed development would yield a net economic benefit or jeopardise a well-established and expanding sector.

Furthermore, the assessment disregards the significance of environmental quality in bolstering tourism, including how unspoiled landscapes and dark skies enhance visitor experiences and appeal to emerging markets like nature-based tourism and astro-tourism. The failure to include a Dark Skies Assessment exacerbates this shortcoming, creating a notable gap in the understanding of impacts on a recognized and burgeoning aspect of the local economy.

In a context where the island community faces limited economic diversification, this neglect to assess the impacts on tourism has broader implications for employment, local businesses, and community sustainability. The lack of a proper Island Communities Impact Assessment means that these economic vulnerabilities have gone unexamined, contravening requirements set out in the Islands (Scotland) Act 2018.

From a policy standpoint, the application does not demonstrate alignment with the National Planning Framework 4, especially concerning economic impact and the necessity to illustrate net benefits. It also contradicts strategic objectives that prioritize tourism as a growth sector, failing to provide adequate evidence for the competent authority to evaluate the economic repercussions of the proposal.

In summary, the inability to quantify tourism impacts, evaluate environmental influences on visitor behaviour, and recognise the island's economic reliance culminates in a substantial evidential gap. This deficiency hinders a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

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

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

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

The proposal stands in direct opposition to the National Planning Framework 4. It does

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

The environmental risks associated with this proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are not only incomplete but also inconsistent in several areas. The evidential threshold required to discount adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful determination of acceptable impacts.

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

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

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

Additional Comments

I had the privilege and pleasure to visit the beautiful Isle of Lewis in September 2024. I was struck by its stunning scenery, and its deep historical tradition. Standing on the west coast and looking out to sea to the point where the sea and sky met and knowing that same view had been seen by the people who erected the Callanish Stones was deeply moving.

I cannot understand how anyone can consider erecting or be allowed to erect massive wind turbines in such an amazing and unspoiled place. Alongside the impact the offshore components will have, there is also the damage the onshore construction will inflict on a wild, rugged and beautiful island landscape.

I wish to record my opposition to this proposal and my horror and disbelief that it is even being considered.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C142A248

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted for consideration under relevant marine licensing and Environmental Impact Assessment frameworks. Our objection arises from a thorough examination of the Environmental Impact Assessment Report and associated documents, revealing significant planning, environmental, cultural, and procedural deficiencies. The site is located 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 compatibility of the scale, proximity, and design of the project with statutory requirements, national policy, and sustainable development principles.

The application lacks an adequate evidential basis for lawful determination. There is a concerning absence of critical environmental data, and the baseline information provided is both limited and inconsistent, leaving several key aspects of the proposal undefined. The proposed use of a flexible design framework hampers a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures makes it impossible to evaluate their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, leaving claims of negligible or non-significant effects unsupported by robust evidence.

Substantial policy conflicts have been identified. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly regarding biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that it can meet national obligations for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly challenge the statutory tests required for consent and diminish the capacity of the competent authority to determine that the project meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines positioned dangerously close to the shoreline. This raises critical issues regarding landscape capacity, visual dominance, and environmental impact. The cumulative effect of insufficient information, reliance on undefined mitigation measures, evidential deficiencies, and evident policy non-compliance underscores that the application is incomplete and cannot support a lawful determination. In light of these findings, it is imperative that the precautionary principle is applied.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species has significant deficiencies that compromise its reliability and completeness. The West Lewis coastal environment is biologically active and sensitive, yet the baseline data collected is insufficient. The methodologies used do not adequately capture the presence, behaviour, and habitat usage of various species, leading to a lack of sound evidence for assessing potential impacts.

One major oversight is the treatment of otters, which are recognised as a European Protected Species. The application does not properly acknowledge their active use of coastal areas for foraging and movement. Ignoring their core foraging range and behavioural habits means that the assessment fails to evaluate the impacts of construction disturbance, noise, and increased human activity on these animals. This gap undermines any conclusions drawn about the absence of significant effects on otters.

There are also substantial weaknesses in the assessment of basking sharks, where reliance on aerial surveys can lead to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such crucial data further contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a proper evaluation of cumulative and indirect impacts, seasonal variations, and the interactions within the wider ecosystem. This adds uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to accurately identify and assess protected species. The uncertainty introduced by these deficiencies precludes the possibility of confidently excluding adverse effects, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The application does not satisfy the evidential threshold required to demonstrate no adverse effect on the integrity of protected sites. There are significant gaps in evidence, internal inconsistencies, and methodological weaknesses that undermine the reliability

of the ornithological assessment. The assessment fails to adequately evaluate the implications of displacement, collision risk, and habitat loss for internationally important seabird populations on the west coast of the Isle of Lewis, many of which are already in decline. The application suggests that no significant adverse effects are anticipated, yet it simultaneously puts forward a Habitats Regulations derogation case, which implies that significant harm is expected. This contradiction raises serious concerns about the validity of the assessment's conclusions.

Furthermore, the assessment does not sufficiently demonstrate that seabirds associated with protected sites, including the Lewis Peatlands and St Kilda, will not be adversely impacted. The significance of these feeding grounds is not fully considered, and the reliance on modelling methods introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are experiencing severe declines. The methodologies used are likely to underestimate potential mortality rates, particularly where baseline data is lacking and the behavioural responses of these species are not fully understood.

The siting of turbines in a recognised migratory corridor adds another layer of significant risk, effectively creating a barrier within a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor have not been adequately assessed, nor have the potential effects on species with relatively small global populations been considered.

Collectively, these deficiencies represent a failure to comply with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy. The overall conclusion is that the assessment is unreliable due to its internal inconsistencies and insufficient evidence, which prevents a thorough evaluation of impacts and indicates that the application does not meet the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed introduction of large-scale turbines near the shoreline would create a dominant industrial presence that fundamentally alters this character. This change would result in a permanent and irreversible transformation of the landscape.

The assessment of visual impacts is significantly lacking, failing to adequately capture the magnitude of visual change anticipated. The scale and proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, leading to a direct impact on visual amenity and diminishing the qualities of naturalness and remoteness. This crucial aspect of the assessment is not sufficiently articulated, nor is its importance in the context of the sensitive landscape acknowledged.

Concerns also arise regarding the selection and presentation of visual viewpoints within the assessment. Evidence indicates that these viewpoints may not adequately encompass the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This oversight raises the possibility that the extent of visual impact has been understated, thus compromising the reliability of the overall assessment.

Another significant gap is the failure to examine the interconnectedness of landscape, seascape, and cultural heritage. Sites such as the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape, sharing visual and spatial relationships with the Atlantic horizon. The assessment treats these sites as isolated entities, neglecting their interdependence, which results in an incomplete evaluation of impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering how heritage assets are perceived and severing their connection to the natural horizon. This disruption represents not only a visual impact but also a more extensive cultural and spatial harm that has not been adequately addressed in the application.

From a policy standpoint, the proposal contravenes National Planning Framework 4, particularly regarding the protection of natural spaces and historic assets. The degree of change proposed is inconsistent with the need to preserve landscape character, visual amenity, and the setting of culturally significant sites. The lack of a thorough worst-case assessment further weakens any assertion of policy compliance.

Moreover, the identified impacts cannot be effectively mitigated. The size, height, and proximity of the turbines would ensure their presence is dominant and inescapable. Consequently, the resulting change is not something that can be reduced to an acceptable level through mitigation efforts.

Collectively, these deficiencies in the assessment lead to an inaccurate representation of the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. Such shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is at odds with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The evaluation of construction and pollution risks is significantly lacking, which hampers the ability to assess the likely environmental impacts. The proposal involves considerable seabed preparation and installation activities within a dynamic Atlantic environment, yet it does not include comprehensive Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on mitigation and contingency measures that are to be developed after consent, which obstructs any meaningful assessment of their effectiveness or adequacy.

This dependence on unspecified future measures raises alarms given the delicate

nature of the surrounding environment. The West Lewis coastline is home to pristine coastal waters and crucial habitats that are at risk from sediment disruption and contamination. While the application acknowledges potential hazards, including sediment mobilisation and accidental spills of chemicals or oil, it lacks sufficient detail on how such incidents will be prevented, managed, or monitored.

Moreover, there is ambiguity regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without reliable modelling and explicitly 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 recognised as sensitive within the broader assessment.

The lack of detailed emergency response procedures exacerbates these issues. By postponing contingency planning to a stage after consent, the application undermines the ability to evaluate whether adequate safeguards exist to address pollution events. This creates procedural risks and diminishes the capacity of the competent authority to properly assess environmental protection measures during the decision-making process.

From a regulatory standpoint, the postponement of critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is imperative that significant effects and mitigation strategies are evaluated prior to consent; without this information, a lawful determination cannot be reached. Additionally, the application fails to illustrate adherence to policy requirements concerning environmental protection and water quality.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents significant shortcomings in assessing the onshore infrastructure, resulting in a fragmented evaluation that overlooks the interconnected nature of the offshore turbines and onshore works. This separation obscures the full scale of environmental and socio-economic impacts stemming from what is fundamentally a single integrated project.

The onshore components involve crucial elements such as cabling traversing protected moorland, the construction of a substation in proximity to Stornoway, and related access infrastructure through sensitive landscapes. Importantly, excavation activities will occur in deep peat areas, notably within Barvas Moor, which serves as both a critical carbon store and an ecologically sensitive habitat. However, the application fails to offer a thorough assessment of these impacts, resulting in a lack of clarity

regarding the project's overall environmental footprint.

Moreover, the exclusion or postponement of evaluating onshore impacts significantly hampers the ability to understand cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project are examined collectively; yet, by treating offshore and onshore aspects separately, the application fails to fully address the combined consequences on peatlands, local habitats, and surrounding communities.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments, which have policy protections in place. The application does not convincingly demonstrate that the effects on these habitats have been comprehensively assessed or that suitable avoidance measures are in place, highlighting a critical evidential gap in terms of biodiversity protection.

Additionally, concerns surrounding carbon balance arise from the potential release of stored carbon due to peatland disturbance, which could lead to a carbon debt that contradicts the aims of renewable energy initiatives. The application does not sufficiently tackle this issue or confirm that the overall carbon balance remains positive.

The routing of infrastructure across active croft land further complicates matters, potentially conflicting with established land use and legal rights. The application lacks evidence to support that the necessary consents or processes have been initiated, casting doubt on the feasibility and lawful execution of the project.

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

In summary, the division of project components, the lack of thorough assessment, and insufficient evidence regarding environmental and land use impacts collectively render this aspect of the application incomplete and unreliable, ultimately obstructing a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm represents a serious shortcoming in meeting the requirements for sustainable development, as judged against statutory obligations, national policy, and evidential standards. The application mirrors the key issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This time, it is put forward under a more stringent policy framework that places increased emphasis on biodiversity, peatland protection, landscape integrity, and community wellbeing.

Crucially, the application lacks a complete and reliable evidential basis necessary for determination. There are significant gaps in baseline data, an unspecified design envelope, and mitigation measures that are not clearly defined. Additionally, it omits vital impact pathways, including those relating to nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is inadequate, preventing a full understanding of potential significant effects or residual impacts.

Moreover, there are significant procedural failings. The lack of a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018. Furthermore, the failure to provide the full Social Impact Assessment is a material omission. These shortcomings hinder the competent authority from properly evaluating impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal contravenes the National Planning Framework 4 by failing to protect biodiversity, natural areas, and cultural heritage. It does not demonstrate that health and wellbeing impacts are acceptable, nor can it show a net economic benefit owing to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore elements have not been thoroughly assessed, obscuring impacts on peatlands, carbon balance, habitats, and crofting land.

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

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

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

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

Additional Comments

I have regularly taken holidays in Valtos (Uig) for the last 40+years, at different times of the year and value the scenery and wildlife. I'm a keen photographer and the local landscape offers a vast range of subjects at different times of the year. My children have been regular visitors from a young age and one of my sons-in-law bought a house in Valtos, coming up from Edinburgh at every possible opportunity. I was first introduced to the area by my sister who owned a house in Valtos (now owned by her daughter) and both her sons have bought houses in the area. Over the years I have introduced various friends to the area who have stayed with us on their holidays and all have been enchanted by the scenery and wildlife. The Isle of Lewis is a very special place for my family and me.

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: CC7F8E1D

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

Dear Sir/Madam

This letter serves as a formal objection to the application for the proposed Spiorad na Mara Offshore Wind Farm, which has been submitted under relevant marine licensing and Environmental Impact Assessment regimes. A detailed review of the Environmental Impact Assessment Report and its supporting documentation reveals significant deficiencies across material planning, environmental, cultural, and procedural aspects. The development site is situated off the west side of the Isle of Lewis, an area known for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the compatibility of the proposal with statutory requirements, national policy, and sustainable development principles are paramount due to its scale, proximity, and design.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is missing, with baseline information being limited and inconsistent, leaving key elements of the proposal undefined. The flexible design framework impedes a clear understanding of potential significant effects, while the reliance on unspecified mitigation measures hampers the assessment of their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, undermining the claims of negligible or non-significant effects, which are unsupported by robust evidence.

There are substantial policy conflicts evident within the proposal. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. Such conflicts directly challenge the statutory tests required for consent, hindering the competent authority's ability to deem the development acceptable from a policy standpoint.

The unprecedented scale of the proposal, featuring large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, the evidential weaknesses, and the clear policy non-compliance highlight that the application is incomplete and incapable of supporting a lawful determination. Under these conditions, the precautionary principle must apply.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate, failing to offer a complete understanding of the ecological receptors within the West Lewis coastal environment. This area is a highly sensitive marine system known for its biological activity, yet the baseline data is lacking, and the methodologies applied do not effectively capture species presence, behaviour, and habitat usage. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

A significant shortcoming is evident in the treatment of otters, a European Protected Species, where the application neglects to adequately acknowledge and assess their active use of coastal areas for foraging and movement. The assessment does not consider their core foraging range and behavioural patterns, leading to an inadequate evaluation of the potential impacts from construction disturbances, noise, and increased activity. This deficiency undermines any conclusions made regarding the absence of significant effects on otters.

Further issues arise with the assessment of basking sharks, which relies on aerial surveys that introduce notable detection bias, particularly under Atlantic conditions. This methodology is likely to underestimate their presence when compared to established land-based observations that demonstrate frequent usage of these waters. The failure to integrate or properly consider such data further contributes to an incomplete baseline and diminishes the reliability of the conclusions presented.

These methodological shortcomings mean that any conclusions drawn about negligible or non-significant effects are grounded in assumptions rather than robust evidence. The absence of adequate baseline data inhibits a meaningful assessment of cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This creates uncertainty regarding the actual scale of risk posed to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as protected species have not been appropriately identified or assessed. 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, granting consent would not be lawful.

Overall, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies inhibit 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 ornithological assessment contains significant gaps in evidence and internal inconsistencies, which undermine its conclusions. The application fails to meet the evidential threshold required to demonstrate that internationally important seabird

populations on the west coast of the Isle of Lewis will not be adversely affected. This area supports many seabird species that are already in decline. The development is situated within key foraging areas and migratory pathways, yet the assessment does not adequately evaluate displacement, collision risk, or habitat loss.

There is a fundamental contradiction in the application. The developer concludes that there are no significant adverse effects, while also advancing a Habitats Regulations derogation case, which is required only when significant harm is anticipated. This inconsistency raises questions about the reliability of the assessment and suggests that the conclusions presented lack support from the evidence. The assessment fails to provide sufficient proof 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 thoroughly considered, and the reliance on modelling techniques introduces uncertainty, especially for species in severe decline like Kittiwakes and Fulmars. The methodologies used are likely to underestimate mortality, particularly in light of incomplete baseline data and insufficient understanding of behavioural responses.

The siting of turbines within a recognised migratory corridor poses an additional risk by potentially creating a barrier in a primary flight path utilised by species travelling between the United Kingdom and Iceland. The application does not adequately assess the long-term implications of sustained mortality in this corridor or the potential effects on species with relatively small global populations.

From a regulatory viewpoint, the presence of contradictory conclusions, data gaps, and limitations in modelling means that the standard of beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing a lawful conclusion that supports consent. Furthermore, the identified deficiencies demonstrate a failure to comply with National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The inability to show that internationally important seabird populations will not be adversely affected places the proposal at odds with national policy.

Overall, the assessment is unreliable due to these internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a robust evaluation of impacts and contribute to the conclusion that the application does not satisfy the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The 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.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The transparency surrounding the assessment of social impacts, health, and wellbeing is critically lacking, resulting in a deficient evaluation. The developer undertook a Social Impact Assessment that included focus groups with local residents; however, the complete report remains unpublished. This significant evidential gap hinders both the public and the competent authority from fully grasping the social risks highlighted by the developer's own research.

Residents are reportedly experiencing stress, anxiety, and concern due to the scale and proximity of the proposed development. These effects are based on direct engagement,

rendering them non-speculative. Nevertheless, the failure to disclose the full assessment limits proper scrutiny of these findings and obstructs the ability to evaluate their relevance in the decision-making process.

Moreover, there is evidence that the proposal is viewed as a direct threat to community identity and cohesion, with "cultural loss" identified in the developer's findings. Unfortunately, these significant impacts have not been sufficiently integrated into the primary application or afforded the necessary consideration. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A comprehensive understanding of the social, economic, and health impacts is vital for projects of this magnitude, especially when the character and functioning of the community could be at stake. The failure to provide the full dataset means that the application does not offer a complete evidential basis for evaluating the balance between benefits and potential harm.

From a policy standpoint, the application does not comply with National Planning Framework 4 regarding health and wellbeing. Development should facilitate positive health outcomes and mitigate harm; yet, the evidence available suggests existing adverse effects that have not been thoroughly disclosed. Without the complete assessment, demonstrating compliance with this policy is impossible.

The procedural implications are considerable. The competent authority cannot conduct a robust socio-economic and health evaluation without access to the entire Social Impact Assessment. This omission is significant within the application and constitutes a failure to meet the evidential standards required by the Environmental Impact Assessment regime.

In summary, the non-disclosure of the complete Social Impact Assessment, in conjunction with evidence of existing adverse impacts, renders the assessment both incomplete and unreliable. This situation obstructs a lawful determination and reinforces the assertion that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposed introduction of large-scale turbines close to the shoreline represents a significant threat to the West Lewis coastline. This area is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. Such an industrial presence would create a continuous and dominant alteration to the landscape, leading to a permanent and irreversible transformation that undermines its character.

The application lacks a proper representation of the scale of the visual change that would occur. The height and proximity of the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, adversely affecting

visual amenity and eroding the essential qualities of naturalness and remoteness. The assessment fails to accurately reflect the level of impact and its significance within this sensitive landscape.

There are serious methodological issues regarding the selection and presentation of visual viewpoints. Evidence suggests 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 concerns that the magnitude of the visual impact has been understated, undermining the reliability of the overall assessment.

Moreover, the assessment does not adequately consider the interconnected relationship between landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are part of a broader landscape setting linked to the Atlantic horizon through visual and spatial connections. Treating these sites as isolated entities disregards their interdependence and leads to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these relationships, altering the context in which heritage assets are experienced and affecting their link to the natural horizon. This results not only in visual impacts but also in broader cultural and spatial harm that the application fails to assess adequately.

From a policy standpoint, the proposal stands in direct conflict with National Planning Framework 4 concerning the protection of natural places and historic assets. The scale of change is not compatible with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment seriously undermines 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 dominant and unavoidable. Consequently, the resulting change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation.

Overall, the assessment fails to adequately represent the scale of the impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings prevent a reliable evaluation and highlight that the proposal is incompatible with the protection of this invaluable landscape.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of an assessment regarding dark skies and nocturnal wildlife represents a critical gap within the Environmental Impact Assessment. The coastline of West Lewis is renowned for its exceptionally dark skies, which are essential for environmental quality, cultural identity, and tourism, particularly in relation to the growing sector of astro-tourism. The proposal introduces permanent red aviation lighting that would be

visible over vast distances, creating an intrusive “wall of light” across the western horizon and fundamentally changing the night-time environment.

Moreover, the application fails to evaluate the implications of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies to the identity of the area. The lack of consideration for these impacts leads to a considerable gap in the overall assessment of the landscape and environment.

More alarmingly, there is no examination of how the proposed lighting will affect nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to their phototactic behaviour, which can cause disorientation and increase the risk of collisions. The application lacks any lighting impact assessment or phototaxis study, resulting in a failure to evaluate how the aviation lighting might impact these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Species like 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 significant gap in understanding the ecological impacts involved.

Without a thorough assessment of nocturnal effects, it becomes impossible to ascertain whether protected species or designated sites could be adversely impacted. The necessary evidential standard needed to exclude adverse effects beyond reasonable scientific doubt cannot be achieved, thus invoking the precautionary principle and hindering lawful determination.

From a policy perspective, this omission contradicts the National Planning Framework 4 concerning the protection of natural spaces and the maintenance of environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of night-time environments is a vital aspect of the natural setting.

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

TOURISM

The assessment of tourism impacts lacks material depth and does not adequately evaluate the economic and social ramifications for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and sense of remoteness. Although the application notes that 86% of visitors are attracted by the scenery, it fails to provide a quantified evaluation of

how large-scale offshore infrastructure would influence visitor numbers, behaviours, or the overall economic contribution.

Tourism has seen considerable growth, rising from £65 million in 2017 to more than £81.5 million, supporting over 1,000 jobs and representing up to 16% of the island's economy. Nevertheless, the application does not assess how the industrialisation of the seascape and the degradation of environmental quality would impact Tourism Gross Value Added or the broader economic resilience of the area. Without this analysis, it is impossible to determine whether the proposed development would offer a net economic benefit or detract from an established and burgeoning sector.

Furthermore, the assessment neglects to consider the significance of environmental quality in bolstering tourism, particularly the value of unspoiled landscapes and dark skies for visitor experiences, as well as for emerging markets such as nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment exacerbates this shortcoming, resulting in a crucial gap in understanding the potential impacts on a recognised and growing segment of the local economy.

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

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the necessity to show 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 implications of the proposal.

Overall, the inability to quantify tourism impacts, assess the environmental factors influencing visitor behaviours, and recognise the island's economic dependencies creates a significant evidential gap. This hinders a thorough evaluation of economic effects and leads to the conclusion that the application is insufficient.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the extent of industrialisation was deemed unacceptable. Currently, it is being assessed under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are significant deficiencies in the evidential basis for this application. It is marked by critical gaps in baseline data, the continued use of an undefined design envelope,

and an overreliance on unspecified mitigation measures. Additionally, important impact pathways such as nocturnal wildlife, full onshore infrastructure, and tourism effects have been neglected. Consequently, the Environmental Impact Assessment is incomplete, failing to provide a comprehensive understanding of potential significant effects or residual impacts.

Procedural shortcomings are evident as well. The lack of a compliant Island Communities Impact Assessment violates statutory duties under the Islands (Scotland) Act 2018, and the non-disclosure of the complete Social Impact Assessment is a significant omission. These gaps hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application inappropriate for determination.

This proposal contradicts National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural places, and cultural heritage. Furthermore, it fails to establish that health and wellbeing impacts are acceptable and lacks evidence of a net economic benefit, as tourism impact modelling is absent. The cumulative impact of both offshore and onshore elements has not been adequately evaluated, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks remain ambiguous and potentially considerable. The assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and sometimes inconsistent within their own findings. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been fulfilled, engaging the precautionary principle and precluding any lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is both procedurally and substantively unfit for determination. The extensive deficiencies in information, coupled with conflicts with policy and unresolved environmental risks, inhibit a lawful and evidence-based decision. The competent authority is urged to refuse consent on these grounds or to invoke the pertinent regulatory provisions to request the submission of the necessary missing information.

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

Additional Comments

I am registering objection to this wind turbine development as stated below:

They do not have community backing.

There are potential effects on health from low frequency infra-sound

There are potential issues with shadow flicker (from rotating wind turbine blades casting moving shadows).

There are potential risks to wildlife and leisure pursuits.

There is the risk of Excess Amplitude Modulation (thumping/swooshing noise that carries and is most noticeable at night) associated with wind turbines and that the issue is more widespread than previously acknowledged.

They will have a cumulative visual effect for residents and visitors residing near them.

The turbines are planned to be planted along the coastline, a coastline that is home to numerous species, and is currently a popular whale path. These turbines have the ability to affect whales, sea birds, sea life, community life and indigenous rights. Wind Turbines have a well-documented impact on birds as well as the seabed and sea life, particularly whales, fish, mammals, and other life forms – through the physical space they take as well as noise and light pollution.

I am against renewable energy that risks destroying a healthy ecosystem and a unique habitat - (a Scottish Government scientific report on the west coast of Lewis states that "the Outer Hebrides are probably the richest area of the UK for marine mammals.")

The health and well being of an indigenous culture (The Isle of Lewis is home to one of Europe's oldest continuous Gaelic-speaking communities, with linguistic and cultural roots stretching back over 5,000 years.) Mental health and well-being for anyone in this area will be subject to the constant light and noise damage from low frequency modulation known to inflict discomfort and potential risks to heart health etc. (Quote "Wind turbines generate low-frequency noise (LFN, 20–200 Hz), which poses health risks to nearby residents." <https://www.nature.com/articles/s41598-021-97107-8>)

The installation of these very large turbines (60+ wind turbines planned to be taller than the Empire State Building and have a wing span that is larger than a Boeing 747) could result in the population being depleted if people choose to move away from the vicinity not only for the above reasons but also potentially from the impact on the scenery and potentially on incomes from possible reduction in tourism.

The Wind Power Lab, Global Wind Turbine Experts, said that: "Studies have demonstrated that turbines operating in areas exposed to frequent heavy rainfall and strong winds tend to experience accelerated erosion."

<https://windpowerlab.com/tackling-leading-edge-erosion>. They also change currents and sediment levels. According to Torsten Fischer, Helmholtz Association of German Research Centres,

In addition, the changes in the flow pattern also have consequences for the accuracy of flow predictions, which are relevant for shipping traffic, for example, but also for disaster management, environmental protection, and fisheries."

<https://phys.org/news/2026-02-offshore-farms-ocean-current-patterns.html>

The proposed plan requires disrupting an ancient peat bog potentially releasing carbon, and contributing to atmospheric carbon dioxide - intensifying the greenhouse effect and accelerating global warming thereby reducing any benefit from wind produced power as a 'green energy solution' in this area.

A great travesty to the local population is that one of the key items of the plan is to build a centre on a graveyard; an overriding disrespect for propriety and local people. Additionally I am against this development as the developer appears to have tried to influence perceptions of the development's benefit to the area, as Northland have done, by giving the development a Gaelic name - Spiorad na Mara.

I am against such a large development (because of the scale – the turbines will dominate the island from The Callanish Stones to the Lighthouse at the Butt of Lewis) that will add to taxpayer costs and may not even be used to increase already high grid input in Scotland. They will be used for only 35 years as there is no plan to dispose of them after the 35 year period... meaning that these turbines will create to a measurable amount of non-biodegradable material for only a short period of use.

Even before this giant wind farm has been built the Scottish gridline is at maximum capacity. Scotland already produces more wind energy than the grid can carry. I understand the transmission lines from Scotland to England can handle around 6 gigawatts. On a windy day, Scottish wind farms already generate 10 leaving 4 gigawatts of clean electricity with nowhere to go already. So this development will provide profit for no output to the developers, as wind farms get paid to switch off when excess power would be generated.

I am ardently against allowing non UK profiteers to also benefit from UK tax payers paying them to turn off the turbines as there is no capacity for the power they could produce.

[Redacted]

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: FBA78AA9

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

Dear Sir/Madam

This letter serves as a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted for marine licensing and Environmental Impact Assessment. The review of the Environmental Impact Assessment Report and accompanying documents reveals significant deficiencies in planning, environmental considerations, cultural aspects, and procedural matters. The proposed development is situated off the west side of the Isle of Lewis, an area characterised by its Atlantic-facing coastline, near-pristine environment, and strong cultural heritage.

The documentation provided fails to offer adequate evidence for a lawful decision. There are critical gaps in environmental data, while the baseline information presented is limited and inconsistent. Essential components of the proposal remain undefined. The flexible design framework complicates the understanding of possible significant effects, and the reliance on unspecified mitigation measures means that their effectiveness cannot be evaluated. Consequently, the information does not allow for a thorough understanding of the impacts on the environment, culture, or community, and claims regarding negligible or non-significant effects lack robust support.

The proposal presents clear and substantial conflicts with policy. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests needed for consent and impair the competent authority's ability to conclude the development is acceptable under policy guidelines.

The scale of this proposal is unprecedented for the area, with large turbines planned to be positioned close to the shoreline, raising significant issues around landscape capacity, visual impact, and environmental consequences. The combination of insufficient information, dependence on undefined mitigation strategies, 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 should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, failing to deliver a full, transparent, or reliable account of the potential environmental effects of the proposal. The introduction of a flexible Project Design Envelope, lacking specific commitments to turbine dimensions, layouts, or configurations, creates considerable

uncertainty. This uncertainty undermines the integrity of the assessment and hinders a consistent application of a worst-case scenario. Consequently, the impacts outlined may not correspond to the actual development, leaving both the public and the competent authority without a clear understanding of the true extent of environmental effects.

Consent is sought based on the reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. This approach defers essential information to post-consent stages, obstructing any meaningful evaluation of effectiveness or assessment of residual impacts. Such procedural deficiencies contravene the intentions of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation measures are clearly established before any determination.

Moreover, there are critical evidential shortcomings, including gaps in baseline data and limitations in methodology, alongside a reliance on assumptions rather than site-specific evidence. This results in uncertainty about the scale and significance of impacts, particularly as conclusions of negligible or non-significant effects are presented without robust supporting data. The insufficient information obstructs a clear understanding of cumulative and worst-case impacts, introducing scientific uncertainty that is inconsistent with statutory requirements.

As a result, the application does not satisfy the evidential threshold under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This activates the precautionary principle, especially regarding protected species and sensitive habitats. Furthermore, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly concerning biodiversity protection and environmental integrity, as it cannot be shown that impacts have been thoroughly assessed or that appropriate safeguards exist.

In conclusion, the combination of an undefined design envelope, the lack of specified mitigation, and gaps in baseline data renders the Environmental Impact Assessment Report both 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 submitted.

ASSESSMENT OF ALTERNATIVES

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

There is a lack of transparent, evidence-based comparisons regarding alternative offshore locations, scales of development, or design configurations. The application

does not convincingly demonstrate that the developer has considered placing turbines further offshore, where potential visual, ecological, and coastal impacts could be lessened. The sensitivity of the West Lewis coastline is significant, and the choice of siting is crucial in assessing impact. The failure to analyse this means there is no basis to conclude that the proposed location is the least damaging option.

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

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

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

MARINE ECOLOGY AND PROTECTED SPECIES

The application presents a serious shortcoming in its assessment of marine ecology and protected species within the West Lewis coastal environment. This area is a highly sensitive and biologically active marine system; however, the baseline data provided is incomplete, and the methodologies used fail to adequately capture the presence, behaviour, and habitat use of species. Consequently, the assessment does not offer a reliable evidential basis for evaluating potential impacts.

A critical gap in the assessment pertains to otters, which are recognised as a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal areas for foraging and movement. Due to the oversight of their core foraging range and behavioural patterns, the assessment does not adequately evaluate the potential effects of construction disturbance, noise, and increased activity, thereby undermining conclusions related to the absence of significant effects on this species.

Further issues are evident in the assessment of basking sharks. The reliance on aerial surveys results in significant detection bias, particularly in the challenging Atlantic conditions. This method is likely to underestimate the presence of basking sharks, especially in light of established land-based observations indicating their frequent use

of these waters. The failure to incorporate or appropriately consider such data leads to an incomplete baseline and diminishes the reliability of the conclusions drawn.

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

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the assessment of protected species is insufficient. The uncertainty introduced prevents the clear exclusion of adverse effects beyond reasonable scientific doubt, necessitating the invocation of the precautionary principle. Under these conditions, it is not lawful to grant consent.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the application is fundamentally flawed, revealing significant evidence gaps and internal contradictions that compromise its conclusions. Located within key foraging areas and migratory pathways, the site on the west coast of the Isle of Lewis is home to internationally important seabird populations, many of which are in decline. However, the application fails to provide the necessary evidential standard to ensure that these species will not suffer adverse effects.

A critical inconsistency arises within the application, where the developer asserts that there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is only warranted when significant harm is anticipated. This contradiction undermines the assessment's reliability and suggests that the presented conclusions lack adequate support from the evidence.

Furthermore, the assessment does not convincingly demonstrate that seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is inadequately addressed, and the reliance on modelling introduces uncertainty, particularly concerning species in severe decline like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, particularly where baseline data is lacking and the behavioural responses of birds are not fully understood.

The siting of turbines within a recognised migratory corridor adds a further substantial

risk, effectively establishing a barrier along a primary flight path used by species migrating between the United Kingdom and Iceland. The application inadequately evaluates the long-term consequences of ongoing mortality within this corridor or the potential impacts on species that have relatively small global populations.

From a regulatory standpoint, the application does not satisfy the evidential threshold required to affirm that there will be no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, along with data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle, rendering a lawful conclusion in favour of consent unattainable.

Collectively, these identified deficiencies signify non-compliance with the National Planning Framework 4 concerning biodiversity protection and the safeguarding of natural assets. The failure to demonstrate that internationally significant seabird populations will not be adversely affected puts the proposal in direct opposition to national policy.

In summary, the assessment's reliability is compromised by internal inconsistencies, methodological flaws, and a lack of sufficient evidence. These issues hinder a thorough evaluation of the potential impacts and culminate in the overall conclusion that the application fails to meet the statutory requirements necessary for determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal presents significant deficiencies in its assessment of seascape, landscape, and visual impacts, failing to reflect the true scale of change and the sensitivity of the local environment. The West Lewis coastline is characterised by an open Atlantic horizon, a largely undeveloped nature, and a profound sense of remoteness. Introducing large-scale turbines near the shoreline would result in a dominant industrial presence that fundamentally transforms this unique character, leading to a permanent and irreversible alteration of the landscape.

The magnitude of the anticipated visual change is not adequately represented in the application. Given the scale and proximity of the turbines, they would significantly dominate views from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently convey this level of impact or its importance in the context of such a sensitive landscape.

Concerns arise regarding the methodology used to select and present visual viewpoints, as evidence indicates that these may not accurately reflect the most sensitive receptors or worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This suggests the potential understatement of the visual impact, which undermines the reliability of the assessment.

Moreover, the assessment neglects the interconnectedness of landscape, seascape,

and cultural heritage. Notable sites such as the Calanais Standing Stones and other Scheduled Monuments are integrated into a broader landscape setting that is linked through visual and spatial relationships to the Atlantic horizon. Treating these assets in isolation fails to acknowledge their interdependence, leading to an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal directly conflicts with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of the proposed changes is not compatible with the requirements to safeguard landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further diminishes the credibility of any claims of policy compliance.

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

Overall, the assessment inadequately represents the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These shortcomings hinder a reliable evaluation and emphasise the conclusion that the proposal is incompatible with the protection of this valuable landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment presented regarding construction and pollution risks lacks the necessary detail for a thorough evaluation of likely environmental effects. The project entails considerable seabed preparation and installation activities within a high-energy Atlantic environment, yet it does not include fully developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application depends on mitigation and contingency measures that would only be formulated after consent is granted, thereby hindering any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures raises significant concerns due to the sensitivity of the affected environment. The West Lewis coastline is home to clean coastal waters and crucial habitats that are susceptible to sediment disturbance and contamination. Although the application recognises risks such as sediment mobilisation and the potential for accidental chemical or oil spills, it falls short in detailing how these risks will be prevented, controlled, or monitored.

There is also ambiguity concerning the scale and behaviour of sediment plumes

resulting from seabed disturbance and cable installation. The lack of robust modelling and clearly outlined management strategies makes it impossible to ascertain the extent, duration, or ecological consequences of these impacts. This uncertainty is applicable to potential effects on marine species and habitats that have already been recognised as sensitive in the broader assessment.

Moreover, the deficiency 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 adequate safeguards are established to respond to pollution incidents. This introduces procedural risks and undermines the competent authority's capacity to assess environmental protection measures at the decision-making stage.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation measures must be evaluated before consent is granted, 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.

Overall, the lack of clearly defined mitigation measures, insufficient management plans, and uncertainty regarding potential impacts result in an assessment that is materially deficient. These issues obstruct a comprehensive evaluation of construction and pollution risks and further reinforce the assertion 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 comprehensive evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a varied marine ecosystem and a vibrant fishing industry. However, the proposal does not demonstrate how these habitats and activities can be safeguarded from substantial disruption.

One major concern lies in the presumption that fishing activities can be relocated without negative effects. There is no evidence supplied that alternative fishing grounds are accessible or capable of supporting additional fishing pressure. This lack of information is critical, as displacement could lead to overfishing in other areas, potentially resulting in broader economic repercussions for the local fishing fleet. Consequently, the implications for fisheries and livelihoods remain poorly understood due to the absence of a clear, evidence-based assessment.

The application raises serious concerns regarding risks to marine species, particularly due to the underwater noise expected from construction activities. The anticipated high-energy hammer piling over a prolonged period may disturb marine life across extensive distances, with species such as dolphins being notably affected. The potential disturbance to a significant portion of the local bottlenose dolphin population

is concerning; however, the application appears to downplay these impacts, lacking adequate supporting evidence.

Moreover, the application inconsistently acknowledges the need for licenses to authorise harm to European Protected Species, while simultaneously describing such impacts as negligible. This contradiction diminishes the credibility of the assessment and prompts worries about compliance with the Habitats Regulations, especially in cases where anticipated harm necessitates legal authorisation.

Furthermore, 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 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 illustrate adherence to the National Planning Framework 4 or the National Marine Plan. It fails to demonstrate that the development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, obstructing any conclusion that the proposal qualifies as sustainable development.

In summary, the inadequacies related to fishing displacement, the underestimation of acoustic impacts, and the internal contradictions within the assessment render it incomplete and unreliable. These shortcomings hinder a thorough evaluation of the effects on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the proposed project is fundamentally flawed due to its failure to consider the full extent of impacts arising from what is a single integrated project. While the offshore turbines and onshore works are intrinsically linked, they have been assessed separately, resulting in a fragmented approach that obscures the true scale of environmental and socio-economic effects.

The onshore infrastructure includes cabling across protected moorland and construction of a substation near Stornoway, along with necessary access infrastructure through sensitive landscapes. This construction entails excavation across areas of deep peat, particularly within Barvas Moor, a significant carbon store and ecologically sensitive habitat. However, the application does not provide a comprehensive assessment of these impacts, thereby preventing a full understanding of the project's overall environmental footprint.

By excluding or delaying the assessment of onshore impacts, the application fails to facilitate proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all components of a project be considered together; yet, the separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately

understood.

There are significant risks to sensitive habitats, including machair systems and peatland environments, which benefit from policy protection. The application does not adequately demonstrate that impacts on these habitats have been fully assessed or that appropriate avoidance measures have been implemented, creating a clear evidential gap in terms of biodiversity protection.

Concerns also arise regarding carbon balance, as the disturbance of peatland releases stored carbon, potentially creating a carbon debt that undermines the objectives of renewable energy development. The application has not sufficiently addressed this issue or shown that the overall carbon balance remains beneficial.

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

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

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

DARK SKIES AND NOCTURNAL WILDLIFE

The proposal introduces permanent red aviation lighting that would be visible over long distances, creating a continuous and intrusive "wall of light" effect across the western horizon. This development is set against the backdrop of the West Lewis coastline, which is known for its exceptionally dark skies. These dark skies are essential to the area's environmental quality, cultural identity, and tourism value. The application fails to assess how this lighting would impact visual amenity, landscape character, or the experiences of both residents and visitors. This is a significant oversight considering the value of dark skies to the region's identity and the potential for growth in sectors such as astro-tourism.

Moreover, there is a critical lack of evaluation regarding the impacts of this lighting on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly sensitive to artificial lighting, which can cause disorientation and increase the risk of collisions. The proposal does not include any assessment of lighting impacts or a phototaxis study, thereby failing to address how aviation lighting might affect these species or increase their mortality rates.

The deficiency is worsened by the dependence on daytime survey data in the ornithological assessment, which does not capture nocturnal activities or the associated risks. Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting. Yet, this risk remains unassessed. The absence of site-specific night-time data represents a significant gap in understanding ecological impacts.

Without an assessment of nocturnal effects, it remains impossible to ascertain whether protected species or designated sites would be adversely impacted. The necessary evidential standard to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, engaging the precautionary principle and hindering lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4 regarding the protection of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a crucial part of the ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development, particularly when evaluated against statutory duties, national policy, and evidential standards. This application mirrors the critical issues that led to the rejection of the Lewis Wind Power proposal in 2008, wherein the unacceptable scale of industrialisation was a decisive factor. Despite being submitted under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application lacks a complete and reliable evidential foundation necessary for informed determination.

There are significant deficiencies in the baseline data provided, and the continued use of an undefined design envelope raises concerns. The reliance on unspecified mitigation measures and the failure to address key impact pathways, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism, render the Environmental Impact Assessment inadequate. This lack of completeness prevents a thorough understanding of likely significant effects or any residual impacts.

The procedural failures are evident, particularly the absence of a compliant Island Communities Impact Assessment, which breaches statutory duties under the Islands (Scotland) Act 2018. Furthermore, the failure to disclose a complete Social Impact Assessment constitutes a material omission, obstructing the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic

resilience. These shortcomings are sufficient to deem the application unfit for determination.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments of marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and precludes a lawful conclusion regarding the acceptability of impacts.

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

In summary, the application is procedurally and substantively unfit for determination. The extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, hinder a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or invokes the necessary regulatory provisions to compel the submission of the missing information.

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

Additional Comments

Whales, dolphins and sharks to name some of the larger sea creatures use this area as part of their migrations. Most folk do not understand that life under the sea is a mirror image of life on land, there are forests of Kelp where juvenile marine life live, learn and grow, currents bringing heat and nutrients like rivers in the sea and landscapes that are inhabited with all manner of sea life from the 300 year old scallop dashing along the sea floor to the sea anemone with her fronds catching miniscule krill. This development will damage all of this and because it is below the waves we will not see the desecration, it will be a lifeless desert, no shelter, food, nursery or spawning grounds. We have declining fish stocks because of over fishing, trawling and destruction of the sea floor, we have an over abundance of wind farms, with the destruction of not only seascapes but onshore landscapes all for the so called net zero, which is just a catch phrase not an achievable reality, and the only people winning are the investors, every thing and every one else are losers and the biggest loser is Mother Earth herself.

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: 7C6951F3

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

Dear Sir/Madam

This representation constitutes a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The development is situated off the west side of the Isle of Lewis, an area renowned for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. Concerns regarding the compatibility of the proposal with statutory requirements, national policy, and the principles of sustainable development are fundamental, given the scale, proximity, and design of the project.

Critical environmental data is missing, and baseline information is limited and inconsistent, leading to significant deficiencies in the Environmental Impact Assessment Report and supporting documentation. The application fails to provide a robust evidential basis for a lawful determination, as key aspects of the proposal remain undefined. The flexible design framework employed prevents a clear understanding of likely significant effects, and reliance on unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation does not facilitate a full or informed understanding of environmental, cultural, or community impacts, undermining claims of negligible or non-significant effects.

There are clear and substantive policy conflicts, with the proposal appearing inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4. This is particularly evident in relation to biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate the capability to meet national requirements for protecting biodiversity, climate interests, and environmental integrity. These conflicts directly affect the statutory tests required for consent and compromise the competent authority's ability to determine that the development is acceptable in policy terms.

The unprecedented scale of the proposal introduces significant concerns regarding landscape capacity, visual dominance, and environmental impact, as large turbines are positioned in close proximity 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 incapable of supporting a lawful determination. In light of these factors, the precautionary principle must apply.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed, failing to deliver a comprehensive, transparent, or dependable account of the potential

environmental effects associated with the proposal. The introduction of a flexible Project Design Envelope, which lacks commitment to specific dimensions, layouts, or configurations for turbines, creates considerable uncertainty. This ambiguity obstructs a consistent assessment of worst-case scenarios, compromising the integrity of the evaluation and preventing both the public and the competent authority from fully grasping the true scale of environmental effects that may arise from the development.

Moreover, the application places undue reliance on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be rectified at a later stage hinders any substantial appraisal of the effectiveness of these measures or the assessment of residual impacts. Deferring essential information to post-consent phases is procedurally unacceptable and contradicts the objectives of the Environmental Impact Assessment framework, which necessitates that likely significant effects and mitigation strategies are clearly identified before any determination is made.

There are also critical evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the magnitude and significance of impacts, particularly in cases where conclusions of negligible or non-significant effects are asserted without robust supporting data. The lack of sufficient information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that is incompatible with statutory obligations.

As a result, the application does not fulfil the evidential threshold mandated by the Habitats Regulations, which is essential to exclude adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not conform to the requirements outlined in National Planning Framework 4, particularly those related to biodiversity protection and environmental integrity, as it fails to establish that impacts have been adequately assessed or that suitable safeguards are in place.

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

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species is inadequate and fails to offer a reliable understanding of the ecological receptors in the West Lewis coastal environment. This area is a biologically active marine system, yet it suffers from incomplete baseline data and methodologies that do not effectively capture species presence, behaviour, and habitat use. Consequently, the assessment lacks a solid evidential basis for evaluating impacts.

A significant gap exists concerning otters, which are a European Protected Species. The application does not sufficiently acknowledge or assess their active use of coastal areas for foraging and movement. This omission regarding their core foraging range and behavioural patterns means that the potential impacts from construction disturbance, noise, and increased activity have not been properly evaluated. Such shortcomings undermine any conclusions drawn about the absence of significant effects on this species.

There are also notable deficiencies in the evaluation of basking sharks. The use of aerial surveys creates a significant detection bias, particularly under Atlantic conditions, leading to an underestimation of their presence. This issue is further highlighted when compared to established land-based observations that indicate frequent use of these waters. The failure to integrate or adequately consider such data results in an incomplete baseline, which further weakens the reliability of the conclusions made.

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

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, revealing significant gaps in evidence and inconsistencies that compromise its conclusions. It is essential to recognise that the west coast of the Isle of Lewis is home to internationally significant seabird populations, many of which are already facing decline. However, the application fails to provide the necessary evidential standard to prove that these species will remain unaffected. The proposed site is situated within critical foraging areas and migratory routes, yet the assessment inadequately evaluates the risks related to displacement, collision, and habitat loss.

Moreover, there exists a crucial contradiction within the application itself, as the developer asserts no significant adverse effects while simultaneously submitting a

Habitats Regulations derogation case. Such a derogation is only warranted when significant harm is anticipated. This inconsistency raises serious doubts regarding the reliability of the assessment and suggests that the conclusions drawn are not supported by the evidence presented.

The evaluation lacks sufficient evidence to ensure that seabirds linked to protected sites, including the Lewis Peatlands and St Kilda, will remain unaffected. The significance of these feeding grounds is not thoroughly addressed, and the reliance on modelling methods injects uncertainty, particularly for species that are already in serious decline, such as Kittiwakes and Fulmars. The methodologies employed may underestimate mortality rates, especially given the incomplete baseline data and the incomplete understanding of behavioural responses.

Additionally, the placement of turbines within a recognised migratory corridor poses another substantial risk, as it effectively obstructs a primary flight path used by species migrating between the United Kingdom and Iceland. The application fails to provide a thorough assessment of the long-term consequences of sustained mortality within this corridor or the potential impact on species that have relatively small global populations.

From a regulatory standpoint, the application does not meet the evidential threshold required to ascertain that there will be no adverse effect on the integrity of protected sites. The presence of contradictory findings, coupled with data deficiencies and limitations in the modelling, signifies that the standard of beyond reasonable scientific doubt has not been satisfied. This situation invokes the precautionary principle and prohibits a lawful conclusion that would support consent.

The identified deficiencies also indicate non-compliance with the National Planning Framework 4 concerning the protection of biodiversity and the preservation of natural assets. The failure to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct opposition to national policy.

In summary, the assessment is deemed unreliable due to its internal contradictions, methodological inadequacies, and lack of sufficient evidence. These shortcomings hinder a rigorous evaluation of potential impacts and culminate in the conclusion that the application does not fulfil the statutory requirements necessary for a lawful determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the cultural heritage and community identity associated with the West Lewis coastline is fundamentally flawed, failing to recognise it as a vibrant cultural landscape where language, tradition, environment, and community are deeply interconnected. Instead of acknowledging the ongoing social, cultural, and spiritual significance of heritage, the application adopts a simplistic view that treats cultural assets as isolated and static.

Significant shortcomings arise in the evaluation of culturally important sites, including the cemeteries located at Dalmore, Bragar, and Barvas. These areas serve as active burial grounds and sites for spiritual practices, yet they are inaccurately classified as static features. This oversight neglects their current use, meaning, and the implications of development on their surroundings. Such a mischaracterisation leads to a deficient understanding of cultural impacts and disregards the vital role these sites play in community life.

Moreover, the application neglects to address intangible cultural heritage, such as the Gaelic language and traditional practices, as well as the enduring relationship between the coastal environment and the local community. These aspects are integral to the identity of the region yet are conspicuously absent from the assessment, representing a critical gap. The cultural repercussions of the proposed development cannot be fully grasped without acknowledging these vital elements.

Concerns also arise regarding community rights and engagement. The Gaelic-speaking population, which embodies a distinct cultural identity reminiscent of Indigenous Peoples, has not been afforded the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement significantly undermines the assessment's credibility and fails to uphold established principles regarding participation in matters that impact cultural and environmental interests.

Additionally, the failure to conduct a compliant Island Communities Impact Assessment, mandated by the Islands (Scotland) Act 2018, constitutes a serious procedural lapse. Without this assessment, the competent authority is unable to fulfil its statutory obligation to assess the social, cultural, and economic effects on the island community. This omission alone precludes a lawful evaluation of the proposal.

From a policy standpoint, these inadequacies place the application at odds with the National Planning Framework 4, particularly concerning the safeguarding of historic sites and assets. The disregard for both tangible and intangible heritage, alongside a failure to acknowledge living cultural practices, clearly diverges from policy expectations.

In summary, the collective failure to evaluate living heritage, intangible cultural values, community rights, and statutory obligations results in a substantial evidential gap. The cultural effects of the proposed development remain inadequately assessed, and the application does not furnish a solid foundation for understanding the true cultural cost associated with this proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer has commissioned a Social Impact Assessment that included focus groups with local residents; however, the full report remains unpublished. This situation creates a significant evidential gap, preventing both the public and the competent authority from fully understanding the social risks identified through the

developer's research. Available summaries reveal that residents are already suffering measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts arise from direct engagement with the community and are therefore grounded in reality, not speculation. Nevertheless, the lack of disclosure of the full assessment hinders proper scrutiny of the findings, limiting the ability to evaluate their significance in the decision-making process.

Furthermore, there is evidence indicating that the proposal is perceived as a threat to community identity and cohesion, with “cultural loss” noted in the developer’s own findings. Despite this, these impacts have not been adequately incorporated into the main application or given appropriate consideration. The failure to publish the complete Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency compromises the Environmental Impact Assessment process. A comprehensive understanding of social, economic, and health impacts is vital for developments of this magnitude, especially when community character and functioning may be jeopardised. By withholding the full dataset, the application does not provide a complete evidential basis for balancing benefits against harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Developments must foster positive health outcomes and mitigate harm; however, the evidence presently available points to existing adverse effects that have not been fully revealed. In the absence of the complete assessment, compliance with this policy remains unproven.

The procedural implications are considerable, as 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 material omission in the application, failing to meet the evidential requirements outlined by the Environmental Impact Assessment regime.

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

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of landscape, seascape, and visual impacts is significantly inadequate and does not reflect the scale of change or the sensitivity of the local environment. The West Lewis coastline is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large turbines near the shoreline would establish a continuous industrial presence that would fundamentally alter this character, leading to a permanent and irreversible transformation of the landscape.

The application does not sufficiently address the magnitude of this visual change. The size and proximity of the turbines would dominate views from residential areas, historic sites, and popular coastal locations, directly impacting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment fails to accurately convey this level of impact or its significance within such a sensitive landscape.

Moreover, there are methodological issues concerning the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully capture the most sensitive receptors or the worst-case scenarios, particularly regarding key cultural heritage sites and valuable landscapes. This raises concerns that the visual impact's magnitude may have been understated, thus compromising the reliability of the assessment.

Another notable deficiency is the lack of consideration for the interconnected relationship between landscape, seascape, and cultural heritage. Significant sites like the Calanais Standing Stones and other Scheduled Monuments are integrated within a broader landscape context that is visually and spatially linked to the Atlantic horizon. The assessment treats these heritage assets in isolation, ignoring their interdependence and resulting in an incomplete evaluation of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal contradicts National Planning Framework 4 concerning the protection of natural places and historic assets. The extent of change is at odds with the need to safeguard landscape character, visual amenity, and the setting of culturally significant sites. The lack of a comprehensive worst-case assessment further diminishes 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 overwhelmingly dominant 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 represent the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reaffirm the conclusion that the proposal is incompatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The absence of detailed management plans, along with undefined mitigation measures, renders the assessment of construction and pollution risks materially deficient. The proposal involves significant seabed preparation and installation activities within a high-energy Atlantic environment, yet there are no comprehensive Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application relies on future mitigation and contingency measures to be formulated post-consent, which hinders any meaningful evaluation of their adequacy or effectiveness.

This reliance on unspecified future actions is particularly concerning given the sensitivity of the receiving environment. The West Lewis coastline, known for its clean coastal waters and important habitats, is vulnerable to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it fails to provide adequate detail on preventative, control, or monitoring measures for these risks.

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

Compounding these issues is the lack of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application obstructs the evaluation of whether suitable safeguards are established to address pollution incidents. This not only introduces procedural risk but also undermines the ability of the competent authority to assess environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of essential environmental safeguards is at odds with the requirements of the Environmental Impact Assessment regime. Significant effects and proposed mitigation measures must be assessed prior to consent; the absence of such information precludes a lawful determination. Furthermore, the application does not demonstrate compliance with policy requirements pertaining to environmental protection and water quality.

In summary, the deficiencies noted in the application—the lack of defined mitigation measures, insufficient detail in management plans, and uncertainty surrounding potential impacts—strongly indicate that a robust evaluation of construction and pollution risks is not feasible, leading to the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The concerns regarding the assessment of fisheries and marine life highlight significant shortcomings in evaluating ecological and socio-economic impacts. The West Lewis

coast is home to a rich marine ecosystem and supports an active fishing industry. However, the proposal does not adequately ensure the protection or maintenance of these vital habitats and activities, raising serious concerns about potential disruptions.

A major flaw in the application is the erroneous assumption that fishing activities can be easily displaced without negative effects. There is no supporting evidence indicating that alternative fishing grounds are available or capable of sustaining increased pressure. This lack of consideration is crucial, as it risks overfishing in other areas and may lead to broader economic repercussions for the local fishing community. The absence of a clear and substantiated assessment inhibits a proper understanding of the impacts on fisheries and local livelihoods.

Moreover, the potential risks to marine species, especially due to construction-related underwater noise, are of great concern. The expected high-energy hammer piling over a prolonged period poses disturbances that could affect marine life, including the local bottlenose dolphin population. Despite the predicted significant disruption, the application downplays these potential effects and fails to provide adequate supporting evidence for its claims.

There exists a troubling inconsistency in the application, acknowledging the necessity for licenses to permit harm to European Protected Species while simultaneously characterising impacts as negligible. This contradiction not only undermines the credibility of the assessment but also raises significant questions regarding adherence to the Habitats Regulations, especially in instances where anticipated harm necessitates legal approval.

Additionally, the application does not address cumulative impacts stemming from various pressures like habitat disturbance, noise, and the displacement of fishing activities. Without a thorough evaluation of these combined effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic fabric of the area.

From a policy standpoint, the application falls short of demonstrating compliance with the National Planning Framework 4 or the National Marine Plan. It does not prove that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, casting doubt on the notion that this proposal aligns with sustainable development principles.

In summary, the gaps in evidence regarding fishing displacement, the underestimation of acoustic impacts, and the inconsistencies within the application collectively render the assessment incomplete and unreliable. These issues obstruct a comprehensive evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application presents an incomplete assessment of the onshore infrastructure, failing to fully consider the impacts of what constitutes a single integrated project. The

offshore turbines and onshore works are closely interconnected; however, they are evaluated separately, resulting in a fragmented analysis that obscures the true scale of environmental and socio-economic effects.

Onshore elements involve significant interventions, including cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure through sensitive landscapes. These activities entail excavation through areas of deep peat, particularly within Barvas Moor, a crucial carbon store and ecologically sensitive habitat. The application lacks a thorough assessment of these impacts, hindering a complete understanding of the overall environmental footprint of the project.

By deferring the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process necessitates that all project components are considered in unison; yet, the disconnection between offshore and onshore elements leaves the combined impacts on peatlands, habitats, and local communities inadequately addressed.

There are significant risks to sensitive habitats such as machair systems and peatland environments, which are under policy protection. The application does not adequately demonstrate that the impacts on these habitats have been thoroughly assessed or that effective avoidance measures are in place, leaving an evidential gap regarding biodiversity protection.

Furthermore, the proposal raises serious concerns about carbon balance. The disturbance of peatland could release stored carbon, potentially resulting in a carbon debt that counters the aims of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Moreover, the routing of infrastructure through active croft land poses potential conflicts with existing land use and legal rights. There is a lack of evidence in the application to show that the required consents or processes have been initiated, prompting questions about the project's deliverability and lawful implementation.

From a policy standpoint, the failure to evaluate the project comprehensively and demonstrate the protection of peatlands, habitats, and land use interests stands in conflict with the National Marine Plan and National Planning Framework 4. The inability to 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 concerning environmental and land use impacts render this section of the application incomplete and unreliable, obstructing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a crucial assessment of dark skies and nocturnal wildlife, representing a significant oversight. The coastline of West Lewis is known for its exceptionally dark skies, which are essential to the area's environmental quality, cultural identity, and tourism potential. The proposal introduces permanent red aviation lighting, which would be visible over extensive distances and create a continuous “wall of light” effect across the western horizon, thus fundamentally changing the night-time environment.

Furthermore, the application does not evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of both residents and visitors. This omission is particularly notable given the significance of dark skies to the local identity and the growth of tourism sectors such as astro-tourism. The lack of consideration for these impacts leads to a clear deficiency in the overall landscape and environmental assessment.

Additionally, there is no investigation into the impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly vulnerable to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collision. The application fails to include any lighting impact assessment or phototaxis study, thus neglecting to evaluate how aviation lighting may affect these species or exacerbate mortality rates.

This gap is exacerbated by the dependence on daytime survey data within the ornithological assessment, which does not account for nocturnal activity or the associated 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 assessed. The absence of site-specific night-time data leaves a critical void in understanding the ecological impacts.

Without an assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites would experience adverse effects. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt is unmet, thus invoking the precautionary principle and inhibiting a lawful determination.

From a policy standpoint, this omission is at odds with National Planning Framework 4 concerning the safeguarding of natural places and environmental quality. It also diminishes the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a vital component of the overall ecosystem.

In summary, the failure to conduct an assessment of dark skies and nocturnal wildlife constitutes a major evidential gap. The lack of baseline data, impact modelling, and species-specific analysis renders the application incomplete and insufficient to support a lawful determination.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm raises significant concerns regarding compliance with sustainable development principles, as mandated by statutory obligations, national policy, and evidential requirements. The application mirrors the fundamental issues that led to the previous rejection of the Lewis Wind Power proposal in 2008, highlighting the unacceptable scale of industrialisation. This current proposal is presented within a more robust policy environment that emphasises the importance of biodiversity, peatland conservation, landscape preservation, and community health.

There are substantial deficiencies within the application that undermine its evidential basis for determination. Specifically, the lack of comprehensive baseline data, the ongoing use of an undefined design envelope, and reliance on unspecified mitigation measures all contribute to a flawed assessment. Additionally, the failure to account for key impact pathways, such as effects on nocturnal wildlife, the full extent of onshore infrastructure, and potential impacts on tourism, renders the Environmental Impact Assessment incomplete. As a result, the likely significant effects and residual impacts remain poorly understood.

Furthermore, procedural inadequacies are evident in the application. The omission of a compliant Island Communities Impact Assessment breaches the statutory duty imposed by the Islands (Scotland) Act 2018. Additionally, the failure to provide the full Social Impact Assessment constitutes a material shortcoming. Such lapses inhibit the competent authority's ability to evaluate the implications for community wellbeing, cultural identity, and economic resilience, thus rendering the application unsuitable for consideration.

Conflicts with National Planning Framework 4 are clear, as the proposal fails to adequately protect biodiversity, natural environments, and cultural heritage. It does not demonstrate acceptable health and wellbeing impacts and lacks evidence of a net economic benefit due to the absence of modelling related to tourism impacts. Moreover, the cumulative effects of both offshore and onshore components have not been thoroughly assessed, leading to a lack of clarity regarding impacts on peatlands, carbon balance, habitats, and agricultural land.

Uncertainties persist regarding environmental risks, which could be significant. Assessments pertaining to marine ecology, seabird populations, protected species, and marine mammals remain incomplete and occasionally contradictory. The evidential threshold necessary to eliminate the possibility of adverse effects beyond reasonable scientific doubt has not been achieved, which invokes the precautionary principle and hinders a lawful assessment of impact acceptability.

The proposal would bring about considerable and irreversible alterations to a notably sensitive landscape. The industrial development of the coastline facing the Atlantic, the erosion of dark skies, the disruption of cultural and visual connections, and adverse effects on tourism all signify permanent changes that cannot be adequately mitigated.

In conclusion, the application stands as both procedurally and substantively

inadequate for determination. The extensive information gaps, coupled with conflicts with policy and unresolved environmental concerns, hinder the possibility of a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke relevant regulatory provisions to demand the submission of necessary information.

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

Additional Comments

As a bee researcher and lover of the Isle of Lewis, this project will have devastating consequences on the ground nesting gees whose habitat will be disrupted during the construction.

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: CDACF17B

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. A review of the Environmental Impact Assessment Report and its accompanying documentation has revealed serious deficiencies in material planning, environmental considerations, cultural impacts, and procedural adherence. The development is situated off the west side of the Isle of Lewis, an area recognised for its Atlantic-facing coastline, near-pristine environment, and strong cultural identity. The design, proximity, and scale of the proposal raise significant concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks a solid evidential foundation for a lawful decision. There is a critical absence of environmental data, while the baseline information provided is both limited and inconsistent. Important aspects of the proposal are still undefined. The implementation of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of the environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects lack robust supporting evidence.

Moreover, the proposal presents clear and substantial conflicts with established policy. 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 sufficiently demonstrate compliance with national obligations to protect biodiversity, climate interests, and environmental integrity. These conflicts directly impact the statutory tests necessary for consent and compromise the capacity of the competent authority to deem the development acceptable in policy terms.

The scale of the proposal is unprecedented for this location, with large turbines positioned very close to the shoreline, raising serious concerns related to landscape capacity, visual dominance, and overall environmental impact. Collectively, the lack of sufficient information, the reliance on undefined mitigation, evidential weaknesses, and evident policy non-compliance indicate that the application is incomplete and does not support a lawful determination. In light of these factors, it is imperative that the precautionary principle is applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report lacks essential completeness and transparency, failing to deliver a reliable account of the proposal's likely environmental effects. By employing a flexible Project Design Envelope without committing to specific turbine dimensions, layouts, or configurations, the application introduces considerable uncertainty. This uncertainty obstructs a consistent application of a worst-case scenario, undermining the integrity of the assessment. Consequently, the impacts reported may not accurately reflect the actual development, leaving both the public and the competent authority unable to comprehend the true extent of environmental effects.

Furthermore, the application depends significantly on mitigation measures, monitoring strategies, and management plans that remain undefined. Seeking consent on the premise that environmental harm will be managed later obstructs meaningful evaluation of effectiveness and assessment of residual impacts. This deferral of crucial information to post-consent stages is procedurally unacceptable and stands in stark conflict with the objectives of the Environmental Impact Assessment regime, which stipulates that likely significant effects and mitigation measures must be clearly identified before determination.

Moreover, there are notable evidential shortcomings, such as gaps in baseline data, methodological limitations, and a reliance on assumptions instead of site-specific evidence. This leads to uncertainty regarding the scale and significance of impacts, especially where negligible or non-significant effects are concluded without robust supporting data. The lack of adequate information hampers a clear understanding of cumulative and worst-case impacts, leading to scientific uncertainty that contravenes statutory requirements.

As a result, the application does not satisfy the evidential threshold necessary under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, particularly regarding 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, and the gaps in baseline data collectively render the Environmental Impact Assessment Report unreliable and incomplete. These deficiencies obstruct a lawful and thorough assessment of environmental effects, thus leaving the competent authority unable to make an informed determination based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, lacking a comprehensive and reliable understanding of the ecological receptors present in this sensitive and biologically rich

marine system. The methodologies employed are inadequate, resulting in incomplete baseline data that fails to accurately capture the presence, behaviour, and habitat use of various species. Consequently, this assessment does not offer a solid evidential basis for evaluating potential impacts.

One significant oversight concerns otters, which are recognised as a European Protected Species. The application does not adequately acknowledge or assess the active use of coastal areas by otters for foraging and movement. The failure to consider their core foraging range and behavioural patterns leads to an insufficient assessment of the potential effects of construction disturbances, noise, and increased activity. This gap undermines any conclusions drawn regarding the absence of significant effects on this species.

Further shortcomings are evident in the assessment of basking sharks. The reliance on aerial surveys introduces a considerable detection bias, particularly under Atlantic conditions. This methodology is likely to result in an underestimation of the presence of basking sharks, especially in light of established land-based observations that indicate these waters are frequently used by them. The omission of such relevant data results in an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological deficiencies mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on rigorous evidence. The lack of adequate baseline data also hampers the ability to meaningfully assess cumulative and indirect impacts, including seasonal variations and broader ecosystem interactions. This situation generates uncertainty regarding the true scale of risk posed to marine species and their habitats.

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

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the proposed development is fundamentally flawed, exhibiting significant evidence gaps and internal contradictions that cast doubt on its conclusions. It is situated in an area of the west coast of the Isle of Lewis that is critical for internationally important seabird populations, many of which are already experiencing declines. The application does not adequately demonstrate that these

species will not be adversely affected, despite their presence in key foraging areas and migratory routes. There is a lack of robust evaluation regarding displacement, collision risk, or habitat loss associated with the development.

Notably, a contradiction arises within the application itself, where the developer asserts that there will be no significant adverse effects while simultaneously advocating for a Habitats Regulations derogation case, which only applies when significant harm is anticipated. This inconsistency raises concerns about the reliability of the assessment, suggesting that the conclusions drawn are unsupported by the available evidence. Furthermore, the assessment fails to substantiate that seabird populations linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. The crucial nature of these feeding grounds is not sufficiently acknowledged, and the reliance on modelling creates uncertainty, particularly for species like Kittiwakes and Fulmars that are in severe decline. The methodologies employed are likely to underestimate potential mortality, especially in light of incomplete baseline data and insufficient understanding of behavioural responses.

The positioning of turbines within a recognised migratory corridor introduces another significant risk, effectively acting as a barrier in a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor, along with potential effects on species with relatively small global populations, are not adequately assessed in the application.

From a regulatory standpoint, the application does not fulfil the evidential requirements necessary to ascertain no adverse effect on the integrity of protected sites. The combination of contradictory conclusions, data gaps, and modelling limitations indicates that the standard of beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion that would support the granting of consent. Additionally, these deficiencies demonstrate non-compliance with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The failure to show that internationally important seabird populations will not face adverse effects places the proposal at odds with national policy.

In conclusion, the assessment's reliability is undermined by internal inconsistencies, methodological inadequacies, and a lack of sufficient evidence. These shortcomings hinder a thorough evaluation of impacts and contribute to the overall determination that the application does not satisfy the statutory requirements needed for a lawful decision.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment concerning cultural heritage and community identity is fundamentally flawed, as it neglects to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are deeply interwoven. Instead, the application adopts a narrow view, treating heritage as a collection of isolated, static assets rather than acknowledging their active social,

cultural, and spiritual roles within the community.

A significant shortcoming is evident in the handling of culturally important sites, such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active burial places and centres of spiritual practice; however, the assessment categorises them merely as static features, overlooking their ongoing significance and the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of the cultural effects and disregards the cemeteries' importance to community life.

Moreover, the assessment fails to include intangible cultural heritage, encompassing the Gaelic language, traditions, and the enduring relationship between the community and the coastal environment. These aspects are vital to the area's identity but are conspicuously absent from the evaluation, marking a considerable omission. Neglecting these factors hinders an accurate understanding of the cultural impact of the development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population, which possesses a unique cultural identity recognised as characteristic of Indigenous Peoples, has not been granted the opportunity for Free, Prior and Informed Consent. This lack of meaningful engagement calls into question the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

Another critical issue is the absence of a compliant Island Communities Impact Assessment, which is a statutory requirement under the Islands (Scotland) Act 2018. This omission means that the competent authority is unable to fulfil its legal obligations to evaluate the social, cultural, and economic effects on the island community. Without this assessment, a lawful determination cannot be reached.

From a policy standpoint, the identified deficiencies place the proposal in opposition to National Planning Framework 4, especially concerning the safeguarding of historic assets and sites. The oversight in considering both tangible and intangible heritage, as well as in recognising living cultural practices, clearly diverges from policy expectations.

In summary, the failure to properly assess living heritage, intangible cultural value, community rights, and compliance with statutory obligations results in a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, leaving the application without a solid foundation for assessing the true cultural costs of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts associated with the proposed development is significantly lacking and does not adequately account for the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised

by its expansive Atlantic horizon, undeveloped nature, and profound sense of remoteness. The introduction of large-scale turbines in close proximity to the shoreline would establish a dominant industrial presence, fundamentally altering this character and leading to a permanent and irreversible transformation of the landscape.

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

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

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

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

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

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

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

CONSTRUCTION AND POLLUTION RISKS

The proposal raises significant concerns due to incomplete assessments of construction and pollution risks. This omission hinders the ability to evaluate likely environmental effects accurately. The project entails substantial seabed preparation and installation 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 leans on mitigation and contingency measures that are to be prepared after consent, which prevents any thorough assessment of their adequacy or effectiveness.

This reliance on unspecified future measures is especially troubling given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk of sediment disturbance and contamination. The application admits to risks such as sediment mobilisation and accidental chemical or oil spills but lacks sufficient detail on prevention, control, or monitoring strategies.

There is also 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 applies to potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Furthermore, the absence of detailed emergency response procedures exacerbates these issues. By postponing contingency planning until after consent, the application hampers the evaluation of whether suitable safeguards are in place to tackle pollution incidents. This introduces procedural risks and undermines the competent authority's ability to assess environmental protection measures before determination.

From a regulatory standpoint, the postponement of essential environmental safeguards contradicts the Environmental Impact Assessment regime's requirements. Significant effects and mitigation must be evaluated prior to consent, and the lack of such information makes lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

Overall, the lack of defined mitigation measures, insufficient management plans, and uncertainty about potential impacts make the assessment materially deficient. These deficiencies obstruct a comprehensive evaluation of construction and pollution risks, further supporting the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The application presents a number of deficiencies regarding the assessment of fisheries and marine life, resulting in an incomplete and unreliable evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home

to a diverse marine ecosystem and support an active fishing industry. However, the application does not sufficiently demonstrate that these vital uses and habitats can be protected or maintained without causing significant disruption.

A notable flaw lies in the assumption that fishing activity can be displaced without consequences. The application fails to provide any evidence indicating that alternative fishing grounds are available, accessible, or able to support the added pressure that displacement would create. This oversight is critical, as it raises concerns about potential overfishing in other areas and the possible economic ramifications for the local fishing fleet. Consequently, the impacts on fisheries and livelihoods remain inadequately understood.

The proposal also poses substantial risks to marine species due to underwater noise generated during construction activities. High-energy hammer piling, expected to occur over extended periods, is likely to cause disturbance across vast distances, particularly affecting species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises serious concerns, yet the application minimises the importance of these effects without adequate supporting evidence.

Moreover, there exists a contradiction within the application, where the requirement for licences to allow harm to European Protected Species is acknowledged, while simultaneously claiming that the impacts are negligible. This inconsistency undermines the credibility of the assessment and raises significant questions regarding compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

The assessment further neglects to consider 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 becomes impossible to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application does not establish compliance with the National Planning Framework 4 or the National Marine Plan. It lacks the necessary demonstration that the development can coexist with existing marine users or avoid unacceptable impacts on marine biodiversity, thereby obstructing any conclusion regarding the proposal's alignment with sustainable development.

In summary, the deficiencies in evidence concerning fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies severely compromise the assessment. These shortcomings prevent a 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 is a serious oversight in the Environmental Impact Assessment. The West Lewis coastline is

distinguished by its exceptionally dark skies, which play a crucial role in the region's environmental quality, cultural identity, and tourism potential. The proposed installation of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” across the western horizon, thereby fundamentally altering the night-time environment.

The application fails to evaluate the effects of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of consideration is particularly troubling given the significance of dark skies to the area's identity and to emerging tourism sectors, including astro-tourism. Such omissions result in a notable gap in the overall landscape and environmental assessment.

Furthermore, there is no evaluation of potential impacts on nocturnal wildlife. Species like the Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can cause disorientation and increase the risk of collisions. The application does not include any assessment of lighting impacts or phototaxis studies, failing to address how the proposed aviation lighting might affect these species or contribute to increased mortality rates.

This issue is exacerbated by the dependence on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and associated risks. For example, Kittiwakes may forage or migrate at night and are susceptible to disorientation from artificial lighting, yet this risk has not been evaluated. The lack of site-specific night-time data creates a significant gap in understanding ecological impacts.

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

From a policy standpoint, the omission contradicts National Planning Framework 4 concerning the protection of natural places and environmental quality. Additionally, it undermines a comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is integral to the overall ecological setting.

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

TOURISM

The application acknowledges that 86% of visitors are attracted by scenery, yet it does not assess how large-scale offshore infrastructure could influence visitor numbers, behaviour, or the overall economic contribution of tourism. Tourism is crucial for the

Isle of Lewis, relying on the region's wild coastline, near-pristine landscape, dark skies, and sense of remoteness. Since 2017, tourism has expanded from £65 million to over £81.5 million, supporting more than 1,000 jobs and representing up to 16% of the island's economy.

The assessment fails to consider how the industrialisation of the seascape and loss of environmental quality could affect Tourism Gross Value Added or the overall economic resilience of the area. Without this analysis, it is impossible to ascertain whether the proposed development would result in a net economic benefit or hinder a vital and growing sector. The omission of a Dark Skies Assessment further exacerbates this issue, creating a significant gap in understanding the impacts on a recognised segment of the local economy, namely nature-based tourism and astro-tourism.

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

From a policy viewpoint, the application does not demonstrate adherence to National Planning Framework 4, particularly regarding economic impact and the need to show net benefit. It contradicts strategic objectives that prioritise tourism as a growth sector and fails to provide sufficient evidence for the competent authority to evaluate the economic implications of the proposal.

Overall, the deficiencies in quantifying tourism impacts, analysing the environmental drivers of visitor behaviour, and acknowledging the island's economic dependency create a significant evidential gap. This undermines a thorough assessment of economic effects and leads to the conclusion that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined in 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 extent of industrialisation was deemed unacceptable. This current application is put forward under a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and the wellbeing of the community.

The evidential basis for this application is incomplete and unreliable. Significant gaps in baseline data are evident, with the continued use of an undefined design envelope, reliance on unspecified mitigation measures, and the omission of crucial impact pathways such as nocturnal wildlife, comprehensive onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment lacks completeness, hindering a full understanding of potential significant effects or residual impacts.

Moreover, there are notable procedural shortcomings. The failure to produce a compliant Island Communities Impact Assessment breaches statutory obligations under the Islands (Scotland) Act 2018, while the omission of a full Social Impact Assessment represents a significant gap. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

The proposal is in direct violation of National Planning Framework 4, failing to demonstrate adequate protection for biodiversity, natural areas, and cultural heritage. It does not confirm that health and wellbeing impacts are acceptable, nor can it substantiate a net economic benefit due to the lack of tourism impact modelling. There has been insufficient assessment of the cumulative impact of both offshore and onshore components, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

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

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

In conclusion, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, in conjunction with policy conflicts and unresolved environmental risks, obstructs a lawful and evidence-based decision. It is imperative that the competent authority either refuses consent based on these grounds or utilises the relevant regulatory 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: CEA3422B

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

Dear Sir/Madam

This letter formally objects to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is based on a review of the Environmental Impact Assessment Report and related documentation, which highlights significant planning, environmental, cultural, and procedural shortcomings. Located off the west side of the Isle of Lewis, this area is characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural heritage. The size, location, and design of the project raise serious questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application does not provide an adequate evidential basis for a lawful decision. There is a lack of critical environmental data, and the baseline information is inconsistent and limited. Important elements of the proposal remain undefined. The reliance on a flexible design framework complicates the understanding of potential significant effects, while the use of unspecified mitigation measures makes it impossible to evaluate their effectiveness. Consequently, the documentation fails to deliver a comprehensive understanding of the environmental, cultural, or community impacts, and claims of negligible or non-significant effects lack solid evidence.

There are notable and substantial policy inconsistencies. The proposal seems 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 obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies challenge the statutory tests needed for consent and weaken the capacity of the competent authority to affirm that the development is acceptable according to policy.

The scale of the proposal is unprecedented for this area, featuring large turbines close to the shoreline, which raises serious concerns about landscape capacity, visual dominance, and environmental impact. In light of the insufficient information, reliance on undefined mitigation measures, evidential weaknesses, and evident policy conflicts, it is clear that the application is incomplete and cannot support a lawful determination. Therefore, the precautionary principle should be applied in this situation.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The application is reliant on an undefined design envelope, which raises significant concerns regarding its environmental assessment. Without commitment to specific turbine dimensions, layouts, or configurations, the proposal introduces considerable

uncertainty. This lack of specificity compromises the integrity of the Environmental Impact Assessment Report, as it does not enable a consistent application of a worst-case scenario, hindering both the public and the competent authority's understanding of the environmental impacts that may arise from the development.

Furthermore, there is a troubling deferral of essential information regarding mitigation measures, monitoring strategies, and management plans, which have not yet been defined. Seeking consent on the premise that environmental harm will be addressed at a later stage precludes any meaningful evaluation of effectiveness or assessment of residual impacts. Such a practice is procedurally unacceptable and contravenes the purpose of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation strategies must be clearly established before determination.

Evidential deficiencies are also present within the report, characterised by gaps in baseline data, limitations in methodology, and an over-reliance on assumptions rather than site-specific evidence. This situation results in uncertainty regarding the scale and significance of the impacts, particularly where conclusions of negligible or non-significant effects are drawn without robust supporting data. The lack of sufficient information hampers a clear understanding of cumulative and worst-case impacts, introducing a level of scientific uncertainty that cannot be reconciled with statutory requirements.

Consequently, the application does not meet the evidential threshold under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt. The precautionary principle must be engaged, especially concerning protected species and sensitive habitats. Additionally, the proposal fails to demonstrate compliance with National Planning Framework 4, including biodiversity protection and environmental integrity requirements, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are in place.

In summary, the deficiencies arising from the reliance on an undefined design envelope, the absence of specified mitigation measures, and the gaps in baseline data culminate in an unreliable and incomplete Environmental Impact Assessment Report. These inadequacies impede a lawful and robust assessment of environmental effects and leave the competent authority unable to determine the application based on the information provided.

ASSESSMENT OF ALTERNATIVES

The application fails to provide a structured and reasoned comparison of realistic alternatives, which is a fundamental requirement of the Environmental Impact Assessment regime. Instead of presenting a transparent analysis based on environmental effects, it offers a narrative account of project development. This omission indicates that the identification, assessment, and selection of less harmful options in preference to more damaging solutions have not been adequately conducted.

Furthermore, there is a notable lack of evidence-based comparison regarding alternative offshore locations, development scales, or design configurations. Specifically, the application does not show that the possibility of placing turbines further offshore has been seriously evaluated, despite the likely reduction in visual, ecological, and coastal impacts. The sensitivity of the West Lewis coastline, coupled with the significance of proximity to the shore in assessing impact, underscores the importance of this analysis. Without it, one cannot conclude that the proposed siting is the least damaging option.

This inadequacy extends to the assessment of cable routing and landfall, where there is little evidence that alternative routes have been thoroughly explored to mitigate impacts on sensitive receptors, including culturally and spiritually significant locations such as Barvas Cemetery. The absence of a clear strategy to avoid impacts, along with the lack of comparative analysis, suggests that mitigation by design has not been applied, relying instead on post-design measures.

Consequently, the application does not demonstrate that environmental harm has been effectively minimised through careful site selection, layout, and infrastructure routing. This failure to adhere to the established mitigation hierarchy hinders the competent authority's ability to assess whether more appropriate and less harmful alternatives exist. The lack of a robust alternatives assessment ultimately raises questions about the sustainability and policy compliance of the proposal.

From a policy standpoint, this deficiency undermines adherence to National Planning Framework 4, especially regarding the protection of natural places, cultural heritage, and community wellbeing. The absence of a structured and comparative assessment is a significant oversight that contributes to the overall conclusion that the application has not been sufficiently evaluated, rendering it incapable of supporting a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species presents significant deficiencies, leading to a lack of reliable understanding of the ecological receptors present in the West Lewis coastal environment. This area is characterised by high biological activity and sensitivity. However, the methodologies employed in the assessment fail to adequately document species presence, behaviour, and habitat use, resulting in an incomplete dataset that undermines the evaluation of potential impacts.

One major shortcoming is the inadequate consideration of otters, a species protected under European law. The application does not properly identify or assess their active use of coastal areas, crucial for foraging and movement. By neglecting their core foraging range and behaviour, the potential impacts of construction disturbance, noise, and increased human activity are not sufficiently evaluated. This gap significantly undermines any claims about the absence of significant effects on otters.

Moreover, the assessment of basking sharks is similarly flawed. The reliance on aerial surveys introduces a considerable risk of detection bias, particularly under Atlantic conditions, which may lead to an underestimation of their presence in these waters. Established land-based observations indicate that these waters are frequently utilised by basking sharks, yet such relevant data has not been appropriately integrated into the assessment, resulting in an incomplete baseline that further weakens the overall conclusions.

These methodological shortcomings mean that the conclusions suggesting negligible or non-significant effects rely more on assumptions than on robust evidence. The lack of adequate baseline data hampers the ability to conduct meaningful assessments of cumulative and indirect impacts, including variations by season and interactions within the wider ecosystem. Consequently, there is considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application falls short of the Environmental Impact Assessment requirements and the National Planning Framework 4, primarily due to the inadequate identification and assessment of protected species. The degree of uncertainty involved prevents the dismissal of potential adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

In summary, the assessment's unreliable nature stems from incomplete baseline data, flawed methodologies, and conclusions lacking adequate support. These deficiencies hinder a robust evaluation of impacts on marine ecology and protected species, culminating in the conclusion that the application is devoid of a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The ornithological assessment presents significant deficiencies, characterised by substantial gaps in evidence and contradictions that undermine its validity. The application does not demonstrate, to the requisite evidential standard, that the internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already experiencing decline, will not suffer adverse effects. The proposed development is situated within crucial foraging areas and migratory routes, yet the assessment fails to adequately evaluate the risks associated with displacement, collision, or habitat loss.

There exists a fundamental inconsistency within the application itself. The developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This contradiction raises serious concerns about the reliability of the assessment and suggests that its conclusions lack proper substantiation from the underlying evidence. Additionally, the assessment does not sufficiently establish that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain unaffected. It does not fully take into account the significance of these feeding grounds,

and its reliance on modelling techniques introduces uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality, especially when baseline data is lacking and behavioural responses are not fully understood.

The positioning of turbines within a recognised migratory corridor further compounds these risks, as it effectively creates a barrier within a primary flight path used by species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and the potential impact on species with relatively small global populations have not been adequately assessed.

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

Furthermore, these identified deficiencies constitute a failure to comply with National Planning Framework 4 concerning biodiversity protection and the preservation of natural assets. The inability to demonstrate that internationally important seabird populations will not be adversely affected places the proposal in direct contradiction with national policy.

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment of the West Lewis coastline's cultural heritage and community identity is severely lacking, failing to recognise the area as a living cultural landscape where environment, language, tradition, and community are deeply intertwined. Instead of acknowledging the ongoing social, cultural, and spiritual significance of heritage, the application adopts a narrow perspective, treating it as a collection of isolated, static assets.

There is a notable deficiency in how culturally significant sites, such as the cemeteries at Dalmore, Bragar, and Barvas, are approached. These locations serve as active places of burial and spiritual practice; however, they are inaccurately categorised as mere static features. This oversight neglects their continued usage and the implications that development may have on their surroundings, leading to an incomplete understanding of cultural effects and disregarding their integral role in community life.

Moreover, the assessment overlooks intangible cultural heritage, including the Gaelic

language, local traditions, and the enduring relationship between the community and its coastal environment. These vital components are essential to the identity of the area and are inexplicably absent from the evaluation, representing a significant gap. The lack of consideration for these aspects hinders a proper understanding of the cultural impact of the proposed development.

Concerns regarding community rights and engagement are also prevalent. The Gaelic-speaking population embodies a distinct cultural identity akin to an Indigenous People, yet no process of Free, Prior and Informed Consent has been observed. This lack of meaningful engagement severely undermines the validity of the assessment and fails to adhere to established principles of participation in decisions that affect cultural and environmental interests.

A crucial procedural flaw is the absence of a compliant Island Communities Impact Assessment, a statutory requirement under the Islands (Scotland) Act 2018. The lack 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 renders a lawful determination impossible.

From a policy perspective, these significant deficiencies place the proposal at odds with the National Planning Framework 4, particularly regarding the protection of historic assets and places. The disregard for both tangible and intangible heritage, along with the failure to recognise living cultural practices, marks a clear deviation from policy requirements.

Ultimately, the collective failure to assess living heritage, intangible cultural value, community rights, and statutory obligations has created a substantial evidential gap. The cultural impacts of the proposed development have not been properly evaluated, and the application fails to provide an adequate basis for understanding the true cultural costs associated with the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposed development is accompanied by a Social Impact Assessment commissioned by the developer, which included engagement with local residents through focus groups. However, the full report has not been published, leading to a significant evidential gap that hinders public understanding and the competent authority's ability to assess social risks identified in the developer's research. Available summaries reveal that local residents are already facing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement and are not speculative, yet without the full assessment, there is limited capacity for proper scrutiny of these findings, making it difficult to ascertain their significance in the decision-making process.

Moreover, the development is perceived as a threat to community identity and cohesion, with "cultural loss" highlighted in the developer's own findings. Despite this recognition, such impacts have not been adequately integrated into the main

application or given appropriate consideration. The withholding of the complete Social Impact Assessment obscures the true social and human costs associated with the development, undermining the Environmental Impact Assessment process. Understanding social, economic, and health impacts is vital for developments of this nature, especially when they may affect community character and functioning. The failure to provide the full dataset results in an application that lacks a comprehensive evidential basis to weigh the potential benefits against the harms.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 concerning health and wellbeing. Development proposals must foster positive health outcomes and mitigate harm; however, existing adverse effects have not been fully disclosed. Without access to the complete assessment, demonstrating compliance with this policy is impossible. The procedural implications are profound, as the competent authority cannot conduct a thorough socio-economic and health evaluation without the full Social Impact Assessment. This omission signifies a failure to meet the evidential requirements set forth by the Environmental Impact Assessment regime. Collectively, the non-disclosure of the full Social Impact Assessment, along with evidence of current adverse impacts, renders the assessment incomplete and unreliable, which ultimately obstructs a lawful determination and supports the view that the application lacks sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal to introduce large-scale turbines close to the West Lewis coastline poses a significant threat to the area's natural landscape and cultural heritage. This region is characterised by its open Atlantic horizon, undeveloped nature, and profound sense of remoteness. The addition of such industrial structures would create a persistent and overwhelming presence that would irrevocably change this character, leading to a permanent alteration of the landscape.

The assessment presented within the application does not adequately reflect the magnitude of the visual changes that would occur. Given their scale and proximity, the turbines would dominate the views from residential areas, historic sites, and popular coastal locations, adversely affecting visual amenity and undermining the essential qualities of naturalness and remoteness. The report fails to convey the true extent of this impact or its significance, particularly within the context of such a sensitive environment.

There are serious methodological issues regarding the selection and representation of visual viewpoints in the assessment. It appears that the chosen viewpoints may not fully represent the most sensitive receptors or potential worst-case scenarios, especially concerning vital cultural heritage sites and high-value landscapes. This raises concerns that the actual magnitude of visual impact has been downplayed, which undermines the credibility of the assessment.

Moreover, the assessment neglects the interconnected relationship between landscape, seascape, and cultural heritage. Important sites, such as the Calanais

Standing Stones and other Scheduled Monuments, are part of a broader landscape connected by visual and spatial relationships to the Atlantic horizon. Instead of recognising this interdependence, the assessment treats these assets as isolated, resulting in an incomplete consideration of the impacts on their setting and cultural significance.

The proposed industrialisation of the seascape would disrupt these relationships, fundamentally altering how heritage assets are perceived and diminishing their connection to the natural horizon. This situation presents not only a visual impact but also a broader cultural and spatial harm that has not been sufficiently evaluated in the application.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly concerning the preservation of natural places and historic assets. The anticipated scale of change is incompatible with the need to protect landscape character, visual amenity, and the setting of culturally significant sites. Furthermore, the lack of a thorough worst-case assessment undermines any assertion of compliance with policy guidelines.

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

In summary, the assessment fails to accurately represent the extent of the impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and reinforce the conclusion that the proposal is incompatible with the safeguarding of this vital 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 presents significant deficiencies in its assessment of fisheries and marine life, failing to offer a robust evaluation of ecological and socio-economic impacts. The waters off the West Lewis coast are home to both a diverse marine ecosystem and an active fishing industry. However, the application does not adequately demonstrate how these uses and habitats can be safeguarded or maintained without considerable disruption.

A critical flaw lies in the assumption that fishing activity can be displaced without repercussions. The application lacks evidence to confirm that alternative fishing grounds are not only available but also accessible and capable of bearing additional pressures. This significant omission raises the risk of overfishing in other areas, which could lead to broader economic consequences for the local fishing fleet. Consequently, without a clear and evidence-based assessment, understanding the impacts on fisheries and local livelihoods is impossible.

Moreover, the proposal poses considerable risks to marine species, especially through the underwater noise produced during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over large distances, notably affecting species such as dolphins. The anticipated disturbance to a significant portion

of the local bottlenose dolphin population is alarming; yet, the application minimises these effects without adequate supporting evidence.

There is also a troubling inconsistency in the application regarding the acknowledgment of the need for licences to permit harm to European Protected Species, while simultaneously asserting that the impacts are negligible. This contradiction undermines the credibility of the assessment and raises serious questions about compliance with the Habitats Regulations, particularly where anticipated harm necessitates legal authorisation.

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

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

In summary, the absence of evidence on fishing displacement, the underestimation of acoustic impacts, and the internal inconsistencies ultimately render the assessment incomplete and unreliable. These shortcomings prevent any meaningful evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment of the project's onshore infrastructure is fundamentally flawed and does not account for the full range of impacts stemming from what constitutes a single integrated project. The offshore turbines are intrinsically connected to the onshore works, yet the assessment treats them separately, leading to a disjointed approach that conceals the true extent of environmental and socio-economic consequences.

The proposed onshore elements involve significant activities such as cabling across protected moorland, the construction of a substation near Stornoway, and the development of access infrastructure traversing sensitive landscapes. These activities entail excavation in deep peat areas, particularly within Barvas Moor, an important carbon store and ecologically sensitive habitat. The application fails to provide a thorough assessment of these impacts, which obstructs a complete understanding of the project's overall environmental footprint.

Moreover, the application excludes a comprehensive evaluation of onshore impacts, hindering the proper assessment of cumulative effects. The Environmental Impact Assessment framework necessitates that all parts of a project be considered collectively; however, the disjunction between offshore and onshore components

results in an insufficient understanding of combined impacts on peatlands, habitats, and local communities.

There are considerable risks posed to sensitive habitats, including machair systems and peatland environments that are subject to policy protection. The application does not adequately demonstrate that impacts on these habitats have been thoroughly assessed, nor does it show that appropriate avoidance measures have been enacted, creating a significant evidential gap concerning biodiversity protection.

Concerns regarding carbon balance are also paramount. Disturbing peatland releases sequestered carbon, which could lead to a carbon debt that contradicts the goals of renewable energy initiatives. The application does not sufficiently address this matter or prove that the overall carbon balance is advantageous.

Additionally, routing infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been pursued, casting doubt on its deliverability and legal viability.

From a policy standpoint, the failure to evaluate the project holistically and to demonstrate the protection of peatlands, habitats, and land use interests stands in opposition to the National Marine Plan and National Planning Framework 4. The inability to prove that impacts can be avoided or mitigated further erodes the application's credibility.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment fails to consider the assessment of dark skies and nocturnal wildlife, which is a significant omission. The West Lewis coastline boasts exceptionally dark skies, contributing to the area's environmental quality, cultural identity, and tourism potential. The proposal intends to introduce permanent red aviation lighting that would be visible over considerable distances, resulting in a continuous and intrusive "wall of light" effect across the western horizon. This change would fundamentally disrupt the night-time environment.

The application lacks an evaluation of the lighting's impact on visual amenity, landscape character, and the experiences of both residents and visitors. This oversight is particularly concerning given the significance of dark skies for the area's identity and the emerging tourism sector focused on astro-tourism. The neglect to assess these factors creates a discernible gap in the overall landscape and environmental evaluation.

Moreover, there is no analysis regarding the impact on nocturnal wildlife. Species such

as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are notably sensitive to artificial lighting due to phototaxis, which can result in disorientation and increased collision risks. The application does not contain a lighting impact assessment or a phototaxis study, leaving unexamined the potential effects of aviation lighting on these species and the possibility of increased mortality.

This issue is exacerbated by the reliance on daytime survey data within the ornithological assessment, which fails to account for nocturnal activities and associated risks. Kittiwakes, for instance, may forage or migrate at night and are also susceptible to disorientation from artificial lighting; however, this risk remains unassessed. The lack of site-specific night-time data creates a crucial gap in understanding the ecological impacts involved.

In the absence of an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites would face adverse effects. The evidential standard required to rule out adverse impacts beyond reasonable scientific doubt cannot be achieved, thereby 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. Additionally, it undermines the comprehensive assessment of landscape and seascape impacts, as the character of night-time environments is an essential aspect of the overall ecology.

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

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal raises significant concerns that cannot be overlooked. It fundamentally fails to meet the requirements for sustainable development as outlined by statutory duties, national policy, and evidential standards. This proposal echoes the issues that led to the rejection of the Lewis Wind Power application in 2008, where the unacceptable scale of industrialisation was a key factor. Presently, it is submitted within a more robust policy framework that emphasises the importance of biodiversity, peatland protection, landscape integrity, and community wellbeing.

Critical gaps exist in the evidential foundation upon which the application stands. There are inadequacies in the baseline data, and the design envelope remains undefined. Furthermore, the proposed reliance on unspecified mitigation measures and the omission of key impact pathways—including those affecting nocturnal wildlife, onshore infrastructure, and tourism—render the Environmental Impact Assessment incomplete. As a result, it hinders a comprehensive understanding of significant effects or residual impacts.

The proposal also faces procedural shortcomings, particularly the absence of a compliant Island Communities Impact Assessment, which contravenes the statutory duty established by the Islands (Scotland) Act 2018. Additionally, the failure to present a full Social Impact Assessment is a substantial omission. These deficiencies obstruct the competent authority from effectively evaluating impacts on community wellbeing, cultural identity, and economic resilience, ultimately deeming the application unsuitable for determination.

Contradicting the National Planning Framework 4, the proposal does not adequately safeguard biodiversity, natural places, or cultural heritage. It fails to demonstrate that impacts on health and wellbeing are acceptable, nor can it evidence a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore elements has not been sufficiently conducted, concealing effects on peatlands, carbon balance, habitats, and crofting land.

The environmental risks presented remain uncertain and could be significant. Incomplete assessments regarding marine ecology, seabirds, protected species, and marine mammals contain inconsistencies. The evidential threshold required to dismiss adverse effects beyond reasonable scientific doubt has not been achieved, which necessitates the application of the precautionary principle and prevents a lawful determination of acceptable impacts.

Moreover, the proposal would induce profound and irreversible alterations to a delicate landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, and disruption of cultural and visual relationships, along with the adverse effects on tourism, represent permanent changes that cannot be adequately mitigated.

In summary, the application is fundamentally unfit for determination, both procedurally and substantively. The multitude of information deficiencies, coupled with policy conflicts and unresolved environmental risks, obstructs the possibility of a lawful, evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or invokes the appropriate regulatory measures to mandate the provision of the necessary information.

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: C16D7C34

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

Dear Sir/Madam

This letter represents a formal objection to the Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment regimes. The concerns stem from a review of the Environmental Impact Assessment Report, which reveals significant deficiencies in planning, environmental protection, cultural preservation, and procedural integrity. The proposed site is located off the west side of the Isle of Lewis, an area recognised for its stunning Atlantic-facing coastline, near-pristine environment, and rich cultural identity. The proposal's scale and design, particularly its proximity to the shore, raise urgent questions about its alignment with statutory requirements, national policy, and the principles of sustainable development.

A critical issue with the application is the lack of a solid evidential basis for any lawful determination. Important environmental data has been omitted, baseline information is both limited and inconsistent, and vital aspects of the proposal remain undefined. This flexible design framework complicates the assessment of potential significant effects, while the unspecified mitigation measures leave their effectiveness unexamined. Consequently, the supporting documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, rendering claims of negligible or non-significant effects unsupported by robust evidence.

Moreover, there are notable policy inconsistencies. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not demonstrate that it can satisfy national requirements to protect biodiversity, climate interests, and environmental integrity. These inconsistencies directly affect the statutory tests for consent and compromise the ability of the competent authority to assess the development's acceptability in terms of policy.

The unprecedented scale of this project, featuring large turbines situated near the shoreline, generates significant worries about landscape capacity, visual dominance, and overall environmental impact. When considering the combination of insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance, it becomes evident that the application is incomplete and unfit for lawful determination. In light of these serious concerns, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several critical deficiencies that compromise its reliability and transparency regarding the potential environmental effects of the proposal. A key issue arises from the application of a flexible Project Design Envelope, which lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces significant uncertainty and obstructs a consistent application of a worst-case scenario, thereby undermining the assessment's integrity and obscuring the true extent of environmental effects from both the public and the competent authority.

Furthermore, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have not been clearly defined. Seeking consent on the premise that environmental harm will be addressed at a later stage obstructs any meaningful evaluation of the effectiveness of these measures or the assessment of residual impacts. This deferral 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 must be clearly established prior to any determination.

Additionally, significant gaps exist in baseline data, methodological limitations, and reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where the application presents conclusions of negligible or non-significant effects devoid of robust supporting data. The lack of sufficient information hampers a comprehensive understanding of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory requirements.

As a result, the application does not satisfy the evidential threshold established under the Habitats Regulations to exclude adverse effects beyond reasonable scientific doubt, thereby invoking the precautionary principle, particularly concerning protected species and sensitive habitats. The proposal further fails to demonstrate compliance with National Planning Framework 4, particularly in relation to biodiversity protection and environmental integrity, as it does not provide assurance that impacts have been fully assessed or that appropriate safeguards are in place.

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

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 ornithological assessment presents significant gaps in evidence, internal inconsistencies, and methodological weaknesses that undermine its conclusions regarding the development's impact on seabird populations. The site is located within key foraging areas and migratory pathways on the west coast of the Isle of Lewis, which supports internationally important seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected.

A notable contradiction exists within the application, where the developer asserts no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case. This is only necessary when significant harm is expected, raising questions about the assessment's reliability. Furthermore, the assessment fails to

provide sufficient evidence to ensure 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 comprehensively considered, and the reliance on modelling approaches introduces uncertainty, particularly for declining species like Kittiwakes and Fulmars. The methodologies employed likely underestimate mortality rates, particularly where baseline data is incomplete and the behavioural responses of species are not fully understood.

The siting of turbines within a recognised migratory corridor poses additional and significant risks, creating a barrier in a primary flight path for species migrating between the United Kingdom and Iceland. The long-term implications of sustained mortality in this corridor and the potential effects on species with relatively small global populations are not thoroughly assessed.

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

Overall, the assessment is unreliable due to its internal inconsistencies, methodological flaws, and lack of sufficient evidence. These shortcomings hinder a robust 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 concerning cultural heritage and community identity is fundamentally deficient, failing to recognise the West Lewis coastline as a dynamic cultural landscape where environment, language, tradition, and community are interlinked. The application adopts an overly simplistic approach, viewing heritage merely as a collection of static assets instead of appreciating their ongoing social, cultural, and spiritual significance to the community.

Particularly concerning is the inadequate treatment of culturally significant sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active locations for burial and spiritual practices; however, the assessment labels them as static features, neglecting their continued use and meaning, as well as the implications of development on their surroundings. This mischaracterisation leads to an incomplete evaluation of cultural impacts and overlooks their importance in community life.

Additionally, the application neglects to address intangible cultural heritage, including

the Gaelic language, local traditions, and the enduring relationship between the community and the coastal environment. These elements are pivotal to the area's identity yet are conspicuously absent from the assessment, representing a significant oversight. The lack of consideration for these factors hinders a comprehensive understanding of the cultural impact of the development.

Concerns also arise regarding the rights and engagement of the community. The Gaelic-speaking population embodies a distinct cultural identity recognised as characteristic of an Indigenous People; however, there has been no implementation of a process for Free, Prior and Informed Consent. The absence of meaningful engagement undermines the credibility of the assessment and fails to adhere to established principles of participation in decisions affecting cultural and environmental interests.

Moreover, a critical procedural shortcoming is the lack of a compliant Island Communities Impact Assessment, which is mandated under the Islands (Scotland) Act 2018. The absence of this assessment inhibits the competent authority from fulfilling its legal obligations to evaluate the social, cultural, and economic effects on the island community. This omission, in itself, prevents a lawful determination.

From a policy standpoint, these shortcomings position the proposal in direct opposition to National Planning Framework 4, particularly regarding the protection of historic assets and places. The failure to consider both tangible and intangible heritage, along with a disregard for living cultural practices, signifies a clear deviation from policy requirements.

In summary, the combined failure to assess living heritage, intangible cultural values, community rights, and statutory obligations creates a significant evidential gap. The cultural implications of the development remain inadequately assessed, rendering the application insufficient for a proper evaluation of its true cultural cost.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The developer commissioned a Social Impact Assessment that included focus groups with local residents, yet the full report remains unpublished. This significant evidential gap obstructs both the public and the competent authority from grasping the complete extent of social risks identified in the developer's own research. Available summaries indicate that residents are already experiencing measurable stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts stem from direct engagement rather than speculation, but the failure to disclose the full assessment hampers proper scrutiny of the findings and limits the capacity to evaluate their significance in the decision-making process.

Moreover, the proposal is viewed as a direct threat to community identity and cohesion, with the developer's findings acknowledging "cultural loss." Despite this recognition, these impacts have not been adequately incorporated into the main application or assigned appropriate weight. The withholding of the full Social Impact Assessment obscures the true human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process. A thorough understanding of social, economic, and health impacts is crucial for developments of this magnitude, especially when community character and functioning may be compromised. By not providing the complete dataset, the application fails to offer a comprehensive evidential basis for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate adherence to National Planning Framework 4 regarding health and wellbeing. Development should promote positive health outcomes and avoid causing harm; however, the available evidence points to existing adverse effects that have not been fully disclosed. Without access to the complete assessment, compliance with this policy cannot be verified.

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

In conclusion, the non-disclosure of the full Social Impact Assessment, coupled with evidence of existing adverse impacts, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and strengthens the argument that the application is not backed by sufficient information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual and landscape impacts of the proposal is inadequate and does not capture the extent of change or the sensitivity of the local environment. The coastline of West Lewis is marked by its open Atlantic horizon, undeveloped character, and a strong sense of remoteness. The placement of large-scale turbines near the shoreline would introduce a continuous industrial presence, significantly altering the character of the area and leading to a permanent change in the landscape.

The application fails to convey the true scale of the visual changes that would occur. The turbines, due to their size and proximity, would dominate the views from residential areas, historic sites, and popular coastal locations. This dominance would negatively affect visual amenity and detract from the area's naturalness and sense of remoteness. The assessment does not sufficiently highlight the significance of this impact in such a sensitive landscape.

Methodological issues also arise from the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not adequately represent the most sensitive receptors or worst-case scenarios, especially regarding important cultural heritage sites and valued landscapes. This raises concerns that the visual impact may have been underestimated, challenging the reliability of the assessment.

Another critical shortcoming is the lack of evaluation of the interconnectedness between landscape, seascape, and cultural heritage. Key sites like the Calanais Standing Stones and other Scheduled Monuments are part of a larger landscape that visually and spatially connects to the Atlantic horizon. The assessment fails to consider these sites as interconnected assets, which leads to an incomplete understanding of the impacts on their settings and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural places and historic assets. The proposed changes are inconsistent with the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Additionally, the lack of a thorough worst-case scenario analysis weakens any assertions of compliance with policy.

Moreover, the identified impacts cannot be mitigated effectively. Given the turbines' scale, height, and proximity, their presence would be overwhelming and unavoidable. The resultant changes are fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

In summary, the assessment does not accurately depict the scale of impact, the sensitivity of the environment, or the interconnectedness of the landscape and heritage. These shortcomings hinder a dependable evaluation and strongly suggest that the proposal is not compatible with the protection of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The proposed development raises significant concerns regarding the incomplete assessment of construction and pollution risks, which fails to provide adequate detail for evaluating potential environmental effects. Given the substantial seabed preparation and installation works proposed in a high-energy Atlantic environment, the absence of fully developed Construction Environmental Management Plans and Pollution Prevention Plans is alarming. The application places reliance on mitigation and contingency measures that are to be prepared post-consent, which hinders any meaningful assessment of their adequacy or effectiveness.

This reliance on undefined future measures is especially troubling considering the sensitivity of the receiving environment. The West Lewis coastline is home to clean coastal waters and important habitats that are susceptible to sediment disturbance and contamination. Although the application acknowledges risks such as sediment mobilisation and accidental chemical or oil spills, it does not sufficiently detail how these risks will be prevented, controlled, or monitored.

Further compounding these issues is the uncertainty regarding the scale and behaviour

of sediment plumes that may arise from 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 extends to the 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 concerns. By postponing contingency planning until after consent, the application prevents a thorough evaluation of whether appropriate safeguards are in place to address pollution events. This introduces procedural risk and undermines the ability of the competent authority to assess the necessary environmental protection measures at the point of determination.

From a regulatory standpoint, the deferral of critical environmental safeguards contradicts the requirements set by the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation strategies are assessed prior to consent, and the absence of such information renders a lawful determination impossible. Additionally, the application does not demonstrate compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, detailed management plans, and the uncertainty surrounding potential impacts create a materially deficient assessment. These shortcomings impede a thorough evaluation of construction and pollution risks and support the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

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

One of the major concerns is the presumption that displacing fishing activity can occur without repercussions. The application lacks any substantiation regarding the availability or accessibility of alternative fishing grounds that could absorb the additional pressure. This lack of evidence is critical, as displacement could lead to overfishing in other areas, with potential adverse economic impacts for the local fishing fleet. The absence of a detailed and evidence-based assessment means that the consequences for fisheries and local livelihoods remain unclear.

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

sufficiently backed by evidence.

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

Furthermore, the assessment does not adequately account for cumulative impacts stemming from multiple stressors, including habitat disturbance, noise pollution, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall implications for marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It does not show that the development can coexist with existing marine users or mitigate unacceptable impacts on marine biodiversity, which ultimately prevents a determination that the proposal is sustainable.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The West Lewis coastline is known for its exceptionally dark skies, which contribute significantly to the area's environmental quality, cultural identity, and tourism potential. However, the Environmental Impact Assessment neglects any examination of dark skies and nocturnal wildlife, marking a substantial omission. The proposed development includes permanent red aviation lighting that would be visible over long distances, leading to a continuous and intrusive "wall of light" effect across the western horizon. This alteration would fundamentally change the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, and the experiences of both residents and visitors. This lack of assessment is particularly concerning given the growing importance of dark skies to local identity and emerging sectors like astro-tourism. Consequently, there is a significant gap in the overall assessment of the landscape and environment.

Moreover, the proposal does not address potential impacts on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are particularly susceptible to artificial lighting due to phototaxis, which can result in disorientation and an increased risk of collision. The absence of any lighting impact assessment or phototaxis study means that the application fails to consider how

aviation lighting may impact these species or contribute to mortality rates.

The situation is further exacerbated by the reliance on daytime survey data within the ornithological assessment, which overlooks nocturnal activity and associated risks. Kittiwakes, for example, may forage or migrate at night and are also at risk of disorientation caused by artificial lighting, yet this risk has not been investigated. The lack of site-specific night-time data leads to a critical deficiency in understanding ecological impacts.

Without a proper assessment of nocturnal effects, it is impossible to determine whether protected species or designated sites could face adverse impacts. The evidential standard required to exclude potential adverse effects beyond reasonable scientific doubt is not met, necessitating the application of the precautionary principle and hindering lawful determination.

From a policy standpoint, this omission contradicts National Planning Framework 4's guidelines regarding the protection of natural places and environmental quality. Furthermore, it undermines the comprehensive evaluation of landscape and seascape impacts, as the character of night-time environments is a crucial aspect of the overall environment.

In summary, the lack of any assessment regarding dark skies and nocturnal wildlife presents a significant evidential gap. The absence of baseline data, impact modelling, and species-specific analysis indicates that the application is 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 required by statutory duties, national policy, and evidential standards. This application echoes the core issues that led to the rejection of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. It is presented now under a supposedly stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

There are substantial deficiencies in the evidential basis for this proposal. Critical gaps in baseline data exist, along with the use of an undefined design envelope. The reliance on unspecified mitigation measures is troubling, and significant impact pathways, such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism effects, have been omitted. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of likely significant effects and residual impacts.

Procedural failures are also evident. The lack of a compliant Island Communities Impact Assessment breaches statutory duty under the Islands (Scotland) Act 2018, while the non-disclosure of the full Social Impact Assessment constitutes a significant

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

In addition, the proposal contradicts the National Planning Framework 4, failing to demonstrate the protection of biodiversity, natural places, and cultural heritage. It does not adequately show that health and wellbeing impacts are acceptable nor does it provide evidence of a net economic benefit, lacking tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly assessed, which obscures effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in certain areas. The evidential threshold required to exclude adverse effects beyond reasonable scientific doubt has not been achieved, necessitating the application of the precautionary principle and preventing a lawful conclusion regarding the acceptability of impacts.

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

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

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

Additional Comments

I have been visiting the Isle of Lewis for over 30 years. I love the diverse wildlife available to watch in their natural habitat. There is no thought to the wildlife with this project. It goes against everything that makes their habitat the perfect breeding ground for them. We share the land and sea with the animals and fish etc. We do not own it.

Yours faithfully,

[Redacted]

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

all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: 6F1FA12D

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 frameworks. A review of the Environmental Impact Assessment Report and its supporting documentation reveals significant material deficiencies in planning, environmental consideration, cultural aspects, and procedural adherence. The project is situated off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, near-pristine environment, and rich cultural identity. Concerns arise regarding the scale, proximity, and design of the proposal, particularly regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application does not provide an adequate evidential basis for lawful determination, as critical environmental data is absent, baseline information is both limited and inconsistent, and essential elements of the proposal remain undefined. The flexible design framework used hinders a clear understanding of potential significant effects. Furthermore, the reliance on unspecified mitigation measures makes it impossible to assess their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust evidence.

Substantial policy conflicts are evident. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment requirements, and National Planning Framework 4, especially concerning biodiversity, natural spaces, cultural heritage, and health and wellbeing. It does not demonstrate compliance with national obligations to safeguard biodiversity, climate interests, and environmental integrity. These conflicts are directly related to the statutory tests necessary for consent and compromise the competent authority's ability to ascertain the development's acceptability within policy parameters.

The unprecedented scale of the proposal, with large turbines situated in close proximity to the shoreline, raises significant concerns about landscape capacity, visual dominance, and environmental impact. Collectively, the lack of sufficient information, reliance on undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is fundamentally flawed and fails to deliver a comprehensive, clear, or dependable evaluation of the anticipated environmental impacts stemming from the proposal. The reliance on a flexible Project Design Envelope, which lacks definitive specifications for turbine dimensions, layouts, or configurations, creates significant uncertainty and hinders a consistent application of a worst-case scenario. This compromise undermines the integrity of the assessment, leading to a situation where the impacts detailed may not correspond to the actual development, thus obstructing both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

The application also places considerable emphasis on unrefined mitigation measures, monitoring strategies, and management plans that remain undefined. As a result, consent is sought under the assumption that environmental harm will be rectified at a later stage, rendering any meaningful evaluation of effectiveness or assessment of residual impacts impossible. This postponement of essential information to post-consent phases is procedurally inappropriate and contradicts the fundamental aim of the Environmental Impact Assessment regime, which stipulates that significant effects and mitigations must be clearly delineated prior to determination.

Moreover, there are notable evidential shortcomings, characterised by gaps in baseline data, methodological limitations, and an overreliance on assumptions rather than site-specific evidence. This leads to uncertainty concerning the scale and significance of impacts, particularly in cases where negligible or non-significant effects are asserted without adequate supporting data. The lack of sufficient information obstructs a clear comprehension of cumulative and worst-case impacts, generating scientific uncertainty that cannot align with statutory obligations.

As a result, the application does not satisfy the evidential standards mandated under the Habitats Regulations, failing to eliminate adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially regarding protected species and sensitive habitats. The proposal also does not show compliance with National Planning Framework 4, which includes provisions for biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that suitable safeguards are established.

In summary, the combination of an undefined design envelope, lack of specified mitigation, and deficiencies in baseline data render the Environmental Impact Assessment Report both unreliable and incomplete. These inadequacies prevent a lawful and thorough assessment of environmental effects and leave the competent authority unable to make a decision based on the information supplied.

ASSESSMENT OF ALTERNATIVES

The failure to provide a structured and reasoned assessment of alternatives significantly undermines the application. It does not meet the statutory requirements of the Environmental Impact Assessment regime and presents a narrative of project evolution rather than a detailed comparison of realistic alternatives based on their

environmental effects. This shortcoming results in a lack of clarity regarding whether less harmful options have been identified, assessed, and chosen over more damaging solutions.

Furthermore, the assessment lacks a transparent and evidence-based comparison of different offshore locations, development scales, and design configurations. The application does not convincingly demonstrate that the developer has adequately considered the possibility of placing turbines further offshore, which could mitigate visual, ecological, and coastal impacts. Given the sensitivity of the West Lewis coastline, the absence of this analysis prevents any conclusion that the proposed siting is indeed the least damaging option available.

This inadequacy is also evident in the evaluation of cable routing and landfall, as there is insufficient evidence that alternative routes have been explored to avoid or minimise impacts on sensitive receptors, including culturally and spiritually significant sites like Barvas Cemetery. The lack of a clear avoidance strategy and comparative analysis points to an absence of mitigation by design, relying instead on post-design measures.

Consequently, the application does not adequately demonstrate that environmental harm has been minimised through considerations of site selection, layout, and infrastructure routing. This represents a significant failure to adhere to the established mitigation hierarchy, making it impossible for the competent authority to ascertain whether more appropriate and less harmful alternatives exist. Without a comprehensive assessment of alternatives, it cannot be concluded that the proposal aligns with sustainability or policy compliance.

From a policy standpoint, this deficiency calls into question adherence to National Planning Framework 4, especially in relation to the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a material omission that reinforces the overall conclusion that the application has not been sufficiently evaluated and is unable to support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The proposed assessment of marine ecology and protected species is inadequate, lacking a comprehensive and reliable understanding of the ecological receptors within the West Lewis coastal environment. This region is a sensitive and biologically rich marine area, yet the baseline data provided is insufficient. The methodologies employed do not effectively capture the presence, behaviour, and habitat use of species. Consequently, the assessment fails to establish a solid evidential foundation for evaluating potential impacts.

One significant gap involves otters, a European Protected Species. The application does not properly acknowledge or assess their active use of coastal areas for foraging and movement. Without considering their core foraging range and behaviour, the assessment inadequately evaluates the potential effects of construction disturbances,

noise, and increased activity. This failure undermines any conclusions drawn regarding the lack of significant effects on otters.

There are also notable shortcomings in the assessment of basking sharks. The reliance on aerial surveys introduces considerable detection bias, especially under Atlantic conditions. This method is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The neglect to integrate or appropriately assess such data leads to an incomplete baseline and weakens the reliability of the conclusions.

These methodological flaws result in conclusions of negligible or non-significant effects being based more on assumptions than on solid evidence. Additionally, the absence of adequate baseline data hampers a meaningful assessment of cumulative and indirect impacts, which includes seasonal variations and interactions within the broader ecosystem. This creates uncertainty about the real 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 it has failed to adequately identify or assess protected species. The level of uncertainty introduced means that adverse effects cannot be excluded beyond reasonable scientific doubt, thereby necessitating the application of the precautionary principle. Under these circumstances, granting consent would not be lawful.

In summary, the combination of incomplete baseline data, flawed methodologies, and unsupported conclusions renders the assessment unreliable. These 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 basis.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its potential impact on seabird populations, particularly given the west coast of the Isle of Lewis is home to internationally important seabird species that are already experiencing declines. The ornithological assessment submitted with the application is fundamentally flawed, marked by significant gaps in evidence and internal inconsistencies that cast doubt on its conclusions. The key foraging areas and migratory pathways that the development encroaches upon have not been adequately evaluated for implications related to displacement, collision risk, or habitat loss.

A critical contradiction is evident in the application, wherein the developer claims there will be no significant adverse effects while simultaneously pursuing a Habitats Regulations derogation case, which is warranted only when significant harm is anticipated. This inconsistency raises serious questions about the reliability of the assessment and suggests that the conclusions presented lack adequate support from the available evidence. The assessment fails to convincingly demonstrate that seabirds linked to protected sites, such as the Lewis Peatlands and St Kilda, will remain

unaffected. The importance of these feeding grounds is insufficiently addressed, and reliance on modelling approaches introduces further uncertainty, particularly concerning species in severe decline, like Kittiwakes and Fulmars. The methodologies employed are likely to underestimate mortality rates, especially due to incomplete baseline data and insufficient understanding of behavioural responses.

Moreover, the siting of turbines within a recognized migratory corridor presents an additional and significant risk by creating a barrier in a primary flight path utilised by species migrating between the United Kingdom and Iceland. The application does not thoroughly assess the long-term consequences of sustained mortality within this corridor or the effects on species with relatively small global populations.

From a regulatory standpoint, the application fails to provide the evidence necessary to confirm that there will be no adverse effect on the integrity of protected sites. The combination of contradictory findings, data gaps, and limitations in modelling means the standard of proving beyond reasonable scientific doubt has not been met. This invokes the precautionary principle and hinders a lawful conclusion in support of consent. Furthermore, the identified deficiencies signify non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to adequately demonstrate that internationally significant seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In summary, the assessment is rendered unreliable due to its internal contradictions, methodological weaknesses, and inadequate evidence. These deficiencies hinder a thorough evaluation of impacts and lead to the overarching conclusion that the application does not fulfil the statutory requirements essential for a lawful determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, landscape, and seascape impacts presented in the application is significantly lacking and does not accurately reflect the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon and a profound sense of remoteness. The placement of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape that cannot be undone.

Furthermore, the application fails to adequately demonstrate the magnitude of visual change that would result. The scale and close proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not convincingly convey the significance of this impact within the context of such a delicate landscape.

Methodological issues also arise concerning the choice and presentation of visual

viewpoints. Evidence indicates that the selected viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and landscapes of high value. This raises concerns about the potential understatement of visual impact, which compromises the overall reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Notable 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. Instead of recognising their interdependence, the assessment treats these sites as isolated, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the preservation of natural environments and historic assets. The scale of the proposed changes is incompatible with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be unavoidable and dominating. As a result, the change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

Collectively, these shortcomings in the assessment prevent an accurate representation of the impact scale, the environment's sensitivity, and the interconnectedness of landscape and heritage. Such deficiencies hinder a reliable evaluation and support the conclusion that the proposal is incompatible with the protection of this landscape.

FISHERIES AND MARINE LIFE

The application does not provide a comprehensive assessment of fisheries and marine life, resulting in an inadequate evaluation of both ecological and socio-economic impacts. The waters off the West Lewis coast are home to a rich marine ecosystem and support a thriving fishing industry. However, the application fails to prove that these vital uses and habitats can be preserved without causing significant disruption.

A major concern is the assumption that fishing activities can be shifted without repercussions. There is no evidence provided to confirm that alternative fishing grounds are available or viable enough to handle increased pressure. This lack of information is

crucial, as the risk of overfishing in other areas is heightened, which could have further economic ramifications for the local fishing fleet. The absence of a thorough and fact-based assessment means the potential impacts on fisheries and the livelihoods they support remain largely unexamined.

Moreover, the proposal presents serious risks to marine species, particularly due to the underwater noise generated during construction. The use of high-energy hammer piling over prolonged periods is likely to disturb marine life over extensive areas, with particular concern for species such as dolphins. The anticipated disturbance to a significant portion of the local bottlenose dolphin population raises alarm, yet the application minimizes these impacts without appropriate supporting evidence.

There is an evident contradiction in the application regarding the requirement for licences to allow harm to European Protected Species. While the need for such licences is acknowledged, the impacts are concurrently described as negligible. This inconsistency undermines the validity of the assessment and raises serious concerns about adherence to the Habitats Regulations, especially where anticipated harm necessitates legal authorisation.

Additionally, the assessment neglects to address cumulative impacts stemming from various pressures, including habitat disturbance, noise, and the displacement of fishing activities. A thorough evaluation of these combined effects is essential 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 illustrate that the proposed development can coexist with current marine users or mitigate unacceptable impacts on marine biodiversity, thereby failing to meet the standards of sustainable development.

In conclusion, the deficiencies present—such as the lack of evidence regarding fishing displacement, the undervaluation of acoustic impacts, and internal contradictions—render the assessment flawed and untrustworthy. These shortcomings hinder a rigorous evaluation of the potential impacts on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The Environmental Impact Assessment lacks a critical evaluation of dark skies and nocturnal wildlife, marking a significant oversight. The West Lewis coastline is defined by its exceptionally dark skies, which are essential to environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting will create a persistent and disruptive “wall of light” across the western horizon, drastically transforming the night-time environment.

Moreover, the application fails to consider how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the relevance of dark skies to the area’s identity and the

growth of tourism sectors like astro-tourism. Consequently, this lack of assessment leads to a considerable deficiency in the overall evaluation of the landscape and environment.

Equally alarming is the absence of an analysis regarding the effects on nocturnal wildlife. Species such as the Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are known to be highly sensitive to artificial lighting, which can cause disorientation and increase the risk of collision. The proposal does not include any assessment of the impacts of lighting or a study on phototaxis, failing to evaluate how aviation lighting might influence these species or escalate mortality rates.

This deficiency is exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activities and the 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 addressed. The absence of site-specific night-time data creates a serious void in understanding the ecological consequences.

Without an assessment of nocturnal impacts, it is impossible to ascertain whether protected species or designated sites might be negatively affected. The evidential standard needed to demonstrate that there are no adverse effects beyond reasonable scientific doubt is not satisfied, invoking the precautionary principle and obstructing a lawful determination.

From a policy standpoint, these omissions are at odds with the National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. Furthermore, they undermine a thorough assessment of landscape and seascape impacts since the night-time character is a vital component of the environment.

In summary, the lack of any evaluation of dark skies and nocturnal wildlife represents a substantial evidential gap. The deficiency 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 fundamentally to meet the requirements of sustainable development as mandated by statutory duties, national policy, and evidential standards. This application recapitulates the significant issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was determined. Despite being presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it does not rectify past deficiencies.

The evidential basis for determination is both incomplete and unreliable. There are notable gaps in baseline data, an undefined design envelope is maintained, and

unspecified reliance on mitigation measures persists. Additionally, key impact pathways, such as those affecting nocturnal wildlife, onshore infrastructure, and tourism, have been omitted. Consequently, the Environmental Impact Assessment remains incomplete, failing to provide a thorough understanding of likely significant effects or residual impacts.

Procedural failings are evident, notably the lack of a compliant Island Communities Impact Assessment, which constitutes a breach of the Islands (Scotland) Act 2018. Furthermore, the failure to disclose the full Social Impact Assessment represents a material omission. These shortcomings inhibit the competent authority from adequately assessing impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately demonstrate the protection of biodiversity, natural places, or cultural heritage. It lacks evidence that health and wellbeing impacts are acceptable and fails to provide a net economic benefit due to insufficient tourism impact modelling. The cumulative impact of both offshore and onshore elements has not been properly evaluated, masking effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal are both uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and exhibit internal inconsistencies. The required evidential threshold to rule out adverse effects beyond reasonable scientific doubt has not been achieved, engaging the precautionary principle and preventing a lawful determination of acceptable impacts.

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

Collectively, these deficiencies in the application render it procedurally and substantively unfit for determination. The significant information gaps, alongside conflicts with policy and unresolved environmental risks, obstruct a lawful, evidence-based decision. The competent authority is urged to refuse consent based on these grounds or to invoke the relevant regulatory provisions to mandate the submission of the missing information.

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

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: 2C16CC2E

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

Dear Sir/Madam

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

The application lacks a robust evidential basis for a lawful determination. There is a notable absence of critical environmental data, and the baseline information provided is both limited and inconsistent. Furthermore, several key components of the proposal remain undefined. The use of a flexible design framework hinders a clear assessment of potential significant effects, while the reliance on unspecified mitigation measures renders any evaluation of their effectiveness impossible. Consequently, the documentation fails to offer a comprehensive understanding of the environmental, cultural, or community impacts, and assertions regarding negligible or non-significant effects lack adequate support from reliable evidence.

There are evident and serious conflicts with established policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural landscapes, cultural heritage, and health and wellbeing. It does not convincingly demonstrate that national mandates to safeguard biodiversity, climate interests, and environmental integrity will be fulfilled. These conflicts are critical to the statutory tests required for consent and undermine the competent authority's ability to determine that the development meets policy standards.

The scale of the proposed development is unprecedented for this area, with large turbines situated alarmingly close to the shoreline, which introduces substantial concerns about landscape capacity, visual dominance, and environmental repercussions. Collectively, the insufficient information, reliance on undefined mitigation strategies, evidential weaknesses, and clear policy non-compliance indicate that the application is incomplete and unfit to support a lawful determination. In light of these circumstances, the precautionary principle should be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report is deficient and does not offer a complete or reliable assessment of the likely environmental effects of the proposal. The lack of commitment to specific turbine dimensions, layouts, or configurations, due to the use of a flexible Project Design Envelope, creates significant uncertainty. This compromises the integrity of the assessment and means that the impacts reported may not align with the actual development, hindering both public understanding and the competent authority's ability to gauge the true extent of environmental effects.

Furthermore, the application relies on mitigation measures, monitoring strategies, and management plans that remain undefined. Consent is sought based on the assumption that environmental harm will be addressed later, which obstructs any meaningful evaluation of effectiveness or assessment of residual impacts. This delay in providing crucial information until after consent is granted is procedurally unacceptable and contradicts the Environmental Impact Assessment regime's purpose, which stipulates that likely significant effects and mitigation must be clearly established prior to determination.

There are also significant evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This leads to uncertainty about the scale and significance of impacts, especially where negligible or non-significant effects are reported without strong supporting data. The lack of adequate information obstructs a clear understanding of cumulative and worst-case impacts and introduces scientific uncertainty that cannot comply with statutory requirements.

As a result, the application does not meet the evidential threshold necessary under the Habitats Regulations to rule out adverse effects beyond reasonable scientific doubt. This invokes the precautionary principle, especially concerning protected species and sensitive habitats. Additionally, the proposal does not demonstrate compliance with National Planning Framework 4, including stipulations about biodiversity protection and environmental integrity, as it has not been shown that impacts have been thoroughly assessed or that suitable safeguards exist.

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

MARINE ECOLOGY AND PROTECTED SPECIES

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

sound evidential basis for evaluating the impacts of the proposed development.

One significant oversight is the assessment of otters, a European Protected Species. The application does not properly recognise their active use of coastal areas for foraging and movement. It neglects to consider their core foraging range and behavioural patterns, which means the potential effects of construction disturbance, noise, and increased activity on otters have not been adequately assessed. This oversight undermines any conclusions regarding the absence of significant effects on this species.

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

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

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

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

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The evaluation of cultural heritage and community identity in the application is fundamentally flawed, neglecting to recognise the West Lewis coastline as a dynamic cultural landscape where the environment, language, tradition, and community are interwoven. Instead, the assessment adopts a simplistic perspective, viewing heritage merely as isolated, static features, thus failing to account for their ongoing social, cultural, and spiritual relevance within the community.

A significant oversight pertains to 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 the assessment categorises them as mere static features, overlooking their continual use, significance, and the development's impact on their surroundings. Such mischaracterisation leads to an inadequate evaluation of cultural effects and ignores their importance to community life.

Moreover, the application does not address intangible cultural heritage, which encompasses the Gaelic language, traditions, and the longstanding connection between the community and the coastal environment. These aspects are crucial to the area's identity but are notably absent from the assessment, marking a substantial omission. Without acknowledging these elements, the cultural implications of the development cannot be fully comprehended.

Concerns extend to community rights and engagement as well. The Gaelic-speaking population embodies a distinct cultural identity recognised as that of an Indigenous People, yet there has been no process of Free, Prior and Informed Consent. The lack of meaningful engagement diminishes the legitimacy of the assessment and fails to uphold established principles regarding participation in matters impacting cultural and environmental interests.

Another critical shortcoming is the absence of a compliant Island Communities Impact Assessment, a requirement under the Islands (Scotland) Act 2018. The lack 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.

From a policy standpoint, these shortcomings place the proposal in direct opposition to the National Planning Framework 4, especially concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, as well as living cultural practices, signifies a clear deviation from policy standards.

In summary, the inadequacies in assessing living heritage, intangible cultural value, community rights, and statutory responsibilities create a substantial evidential gap. The cultural impacts of the development have not been adequately evaluated, and the application does not offer a sound foundation for assessing the true cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The application for large-scale turbines near the West Lewis coastline presents a range of significant deficiencies in its assessment of seascape, landscape, and visual impacts. This area is characterised by an open Atlantic horizon, an undeveloped nature, and a strong sense of remoteness. The introduction of such industrial elements in close proximity to the shoreline would result in a dominant presence that fundamentally transforms this character, leading to irreversible changes to the landscape.

A key issue is the inadequate representation of the visual impact of these turbines.

Their scale and proximity threaten to dominate views from various residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and compromising the essential qualities of naturalness and remoteness. The current assessment does not convey the true extent or significance of this impact within the context of a sensitive landscape.

Moreover, there are serious methodological concerns regarding the choice and presentation of visual viewpoints. The evidence indicates that these viewpoints may not fully account for the most sensitive receptors or depict worst-case scenarios, particularly concerning vital cultural heritage sites and high-value landscapes. This oversight raises doubts about the accuracy of the stated visual impact and undermines the assessment's overall reliability.

Additionally, the application neglects to evaluate the interconnections between landscape, seascape, and cultural heritage comprehensively. Notable sites like the Calanais Standing Stones and other Scheduled Monuments are not viewed in the context of their wider landscape setting and visual relationships with the Atlantic horizon. Instead, they are treated as isolated entities, leading to an incomplete assessment of the impacts on their setting and cultural significance.

The proposed industrialisation would sever the connections that define these heritage assets, fundamentally altering the context in which they are experienced and disrupting their relationship with the natural horizon. This not only represents a visual impact but also indicates broader cultural and spatial harm that remains unassessed in the application.

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4, particularly concerning the safeguarding of natural places and historic assets. The scale of change presented is incompatible with the necessity to protect landscape character, visual amenity, and the settings of culturally significant sites. Furthermore, the lack of a robust worst-case assessment weakens any assertions of policy compliance.

Ultimately, the identified impacts are such that they cannot be effectively mitigated. The scale, height, and proximity of the turbines would render their presence overwhelming and unavoidable. Thus, the changes introduced are fundamental and permanent, incapable of being reduced to acceptable levels through any mitigation measures.

In summary, the overall assessment fails to accurately reflect the scale of impact, the sensitivity of the environment, and the interconnectedness of landscape and heritage. These shortcomings hinder a reliable evaluation and firmly support the conclusion that the proposal is incompatible with the necessary protections for this landscape.

FISHERIES AND MARINE LIFE

The evaluation of marine life and fisheries within the application is notably inadequate, failing to present a thorough analysis of both ecological and socio-economic impacts. The waters off the West Lewis coast are known to host a vibrant marine ecosystem alongside a thriving fishing industry. However, the application does not adequately demonstrate how these critical habitats and activities will be preserved or sustained in the face of proposed developments without incurring significant disruption.

A critical concern arises from the presumption that fishing activities can be relocated without adverse effects. The absence of evidence to support the availability, accessibility, and capacity of alternative fishing grounds is a considerable oversight. This lack of information is particularly troubling, as it poses risks of overfishing in other areas, potentially leading to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the implications for fisheries and the livelihoods dependent on them remain unclear.

Moreover, the proposal raises significant risks to marine species, especially due to the underwater noise produced during the construction phase. The anticipated high-energy hammer piling over an extended period is likely to disrupt marine life across considerable distances, with particular concern for species such as dolphins. The expected disturbance to a notable segment of the local bottlenose dolphin population is alarming, yet the application diminishes the importance of these effects without adequate supporting evidence.

The application also presents inconsistencies by acknowledging the necessity for licences to allow harm to European Protected Species while simultaneously deeming the impacts as negligible. This contradiction calls into question the credibility of the assessment and raises serious concerns regarding compliance with the Habitats Regulations, especially when anticipated harm necessitates legal permission.

Additionally, the assessment neglects to consider cumulative impacts resulting from various pressures, including habitat disruption, noise pollution, and the displacement of fishing activities. A failure to comprehensively evaluate these cumulative effects leaves the overall impact on marine ecosystems and socio-economic conditions indeterminate.

From a policy perspective, the application does not convincingly demonstrate alignment with the National Planning Framework 4 or the National Marine Plan. It falls short of proving that the development can coexist with established marine users or that it can mitigate unacceptable impacts on marine biodiversity, thereby precluding any assertion that the proposal constitutes sustainable development.

Overall, the deficiencies in evidence regarding fishing displacement, the minimisation of acoustic impacts, and the internal inconsistencies of the application result in an incomplete and unreliable assessment. These shortcomings obstruct any robust evaluation of the potential effects on marine life and fisheries.

DARK SKIES AND NOCTURNAL WILDLIFE

The application is fundamentally flawed due to the absence of assessments regarding dark skies and nocturnal wildlife, which represents a substantial omission in the Environmental Impact Assessment. The coastline of West Lewis is known for its remarkably dark skies, an essential aspect of the area's environmental quality, cultural identity, and tourism potential. The introduction of permanent red aviation lighting, which would be visible over extensive distances, threatens to create a continuous and intrusive “wall of light” effect across the western horizon, fundamentally altering the night-time environment.

Moreover, there has been no consideration of how this lighting would affect 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 region's identity and the growth of emerging tourism sectors like astro-tourism. The failure to evaluate these impacts results in a glaring gap in the overall landscape and environmental assessment.

Additionally, there is a complete lack of evaluation regarding the impacts of artificial lighting on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel are particularly sensitive to such lighting, which can lead to disorientation and an increased risk of collision. The application does not contain any lighting impact assessment or phototaxis study, meaning it fails to consider how aviation lighting may influence these species or potentially raise mortality rates.

Compounding this issue is the reliance on daytime survey data in the ornithological assessment, which fails to account for nocturnal activity and the associated risks. For example, Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, yet this has not been evaluated. The absence of site-specific night-time data creates a crucial gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, these omissions contradict National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. This oversight also diminishes the overall assessment of landscape and seascape impacts, as the night-time character is an integral element of the environment.

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

TOURISM

The assessment of the economic impacts on tourism is significantly inadequate, neglecting to analyse the repercussions for a vital sector of the Isle of Lewis economy. Tourism relies heavily on the region's wild coastline, near-pristine landscapes, dark skies, and a sense of remoteness. While the application acknowledges that 86% of visitors are attracted by the scenery, it fails to provide a quantified analysis of how large-scale offshore infrastructure would influence visitor numbers, their behaviours, or the overall economic contributions they make.

Tourism 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. However, the application does not address how the industrialisation of the seascape and degradation of environmental quality would affect Tourism Gross Value Added or the broader economic resilience of the area. In the absence of such evaluation, it is impossible to ascertain whether the proposed development would provide a net economic advantage or jeopardise an established and expanding sector.

Moreover, the assessment overlooks the crucial role of environmental quality in fostering tourism, notably the significance of unspoiled landscapes and dark skies to visitor experiences, as well as emerging markets like nature-based tourism and astro-tourism. The lack of a Dark Skies Assessment further exacerbates this deficiency, creating a considerable void in understanding the impacts on a recognised and expanding facet of the local economy.

In a context where the island community has limited economic diversification, the neglect to evaluate tourism impacts has broader implications for employment, local businesses, and community sustainability. The absence of a valid Island Communities Impact Assessment means that these economic vulnerabilities have not been examined as required by the Islands (Scotland) Act 2018.

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

Collectively, the shortcomings in quantifying tourism impacts, examining environmental factors influencing visitor behaviour, and recognising the island's economic dependencies lead to a considerable evidential gap. This undermines a thorough evaluation of the economic effects and supports the conclusion that the application is fundamentally incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fails to meet the requirements for sustainable development as outlined in statutory duties, national policy, and evidential standards. It raises the same fundamental issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation

was deemed unacceptable. This application is now presented within a more stringent policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

The evidential basis for decision-making is neither complete nor reliable. There are significant gaps in baseline data, the design envelope remains undefined, and it relies on unspecified mitigation measures. Furthermore, key impact pathways have been omitted, including those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment lacks the completeness needed to fully understand the likely significant effects or any residual impacts.

There are also serious procedural shortcomings. The failure to provide a compliant Island Communities Impact Assessment breaches statutory requirements under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of a complete Social Impact Assessment is a material omission. These issues hinder the competent authority's ability to evaluate the impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

In direct conflict with National Planning Framework 4, the proposal does not adequately protect biodiversity, natural places, and cultural heritage. It fails to demonstrate that the health and wellbeing impacts are acceptable and does not provide evidence of a net economic benefit, as there is no tourism impact modelling included. The cumulative effects of both offshore and onshore elements have not been properly assessed, masking potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal are uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent. The evidential threshold necessary to exclude adverse effects beyond reasonable scientific doubt has not been achieved. This engages the precautionary principle and prevents a lawful conclusion regarding the acceptability of impacts.

The proposed project would lead to substantial and irreversible changes to a highly sensitive landscape. It would industrialise the Atlantic-facing coastline, result in a loss of dark skies, disrupt cultural and visual relationships, and negatively impact tourism, leading to permanent effects that cannot be adequately mitigated.

Overall, the application is both procedurally and substantively unfit for determination. The substantial information deficiencies, coupled with conflicts with policy and unresolved environmental risks, obstruct a lawful and evidence-based decision. The competent authority should either refuse consent on these grounds or utilise the necessary regulatory provisions to demand the submission of the missing information.

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

Additional Comments

The wind farm will be visible and ruin the local landscape that's been unchanged for centuries.

Wind farms are an ALTERNATIVE fuel type but not GREEN, they will not even remove the carbon footprint of making them over their life span, where can the blades be recycled to? No where.

Aside from that, it will ruin landscape, and sonar surveys of sea bed bad for marine life and wildlife.

The birds?? Wiped out by the blade.

Small ground mammals?? Wiped out by the construction.

What's the long term gain for the island??? NONE. What happens at the end of life of the windmill??

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: 86E419C7

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, which has been submitted under the marine licensing and Environmental Impact Assessment frameworks. It is informed by a thorough review of the Environmental Impact Assessment Report and related documentation, highlighting significant planning, environmental, cultural, and procedural deficiencies. The proposed development is situated off the west side of the Isle of Lewis, a region characterised by its Atlantic-facing coastline, relatively unspoiled environment, and rich cultural heritage. The scale and design of this proposal, along with its proximity to the shoreline, raise serious questions regarding its alignment with statutory requirements, national policy, and sustainable development principles.

The application lacks a sufficient evidential foundation for lawful determination. There are critical gaps in environmental data, with baseline information being both limited and inconsistent, while significant aspects of the proposal remain undefined. The adoption of a flexible design framework obscures the understanding of potential significant effects, and the reliance on unspecified mitigation measures renders it impossible to evaluate their effectiveness. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

Moreover, there are evident and significant conflicts with policy. The proposal does not appear to comply with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and public health and wellbeing. It does not prove that it can fulfil national obligations to safeguard biodiversity, climate interests, and environmental integrity. These inconsistencies directly undermine the statutory tests necessary for consent and compromise the ability of the competent authority to deem the development acceptable within policy frameworks.

The unprecedented scale of the proposal in this area, with large turbines situated close to the shoreline, raises major concerns about landscape capacity, visual impact, and overall environmental implications. The combination of inadequate information, reliance on undefined mitigation strategies, evidential shortcomings, and clear non-compliance with policy illustrates that the application is incomplete and fails to support a lawful determination. In light of these circumstances, the precautionary principle must be invoked.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species in the application is inadequate, resulting in a lack of a complete understanding of the ecological receptors in the West Lewis coastal environment. This area is biologically active and sensitive, yet the methodologies used fall short of capturing essential data on species presence, behaviour, and habitat utilisation. Consequently, the assessment does not provide a solid evidential basis for evaluating potential impacts.

One critical gap in the assessment is the treatment of otters, classified as a European Protected Species. The application does not adequately recognise their active use of coastal regions for foraging and movement. This oversight regarding their core foraging range and behavioural patterns leads to an insufficient evaluation of how construction disturbances, noise, and increased activity might affect them. Thus, the assessment's conclusions regarding the absence of significant effects on otters are fundamentally flawed.

The assessment also inadequately addresses basking sharks, relying heavily on aerial surveys which introduce considerable detection bias, especially under Atlantic conditions. Such an approach is likely to underestimate their presence, particularly when compared to established land-based observations that indicate frequent use of these waters. The failure to include or give proper consideration to this data results in an incomplete baseline, undermining the reliability of the conclusions reached.

These methodological shortcomings mean that the claims of negligible or non-significant effects are primarily based on assumptions rather than solid evidence. The lack of sufficient baseline data hampers any meaningful evaluation of cumulative and indirect impacts, seasonal variations, and broader ecosystem interactions, leaving considerable uncertainty regarding the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not fulfil the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as the identification and assessment of protected species have not been conducted appropriately. This uncertainty prevents the exclusion of adverse effects beyond a reasonable scientific doubt, thereby invoking the precautionary principle. Under these conditions, the granting of consent is not legally justifiable.

Overall, the combination of incomplete baseline data, inadequate methodologies, and unsupported conclusions renders the assessment unreliable. These deficiencies obstruct a thorough evaluation of the impacts on marine ecology and protected species, reinforcing the notion that the application lacks a robust evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development fails to meet the necessary evidential standards regarding the impact on ornithological factors, particularly concerning internationally important seabird populations along the west coast of the Isle of Lewis, many of which are already in decline. The application does not sufficiently demonstrate that these species will remain unaffected, despite being situated in key foraging areas and migratory

pathways. There is a clear lack of robust evaluation regarding displacement, collision risk, or habitat loss, which raises concerns about the adequacy of the ornithological assessment.

There is a fundamental contradiction within the application, as the developer asserts that there will be no significant adverse effects while concurrently advancing a Habitats Regulations derogation case, which suggests that significant harm is anticipated. This inconsistency undermines the reliability of the assessment and highlights the lack of support for its conclusions based on the available evidence.

Moreover, the assessment does not adequately address the potential impacts on seabirds associated with protected sites, such as the Lewis Peatlands and St Kilda. The significance of these feeding grounds is not thoroughly considered, and the reliance on modelling approaches introduces uncertainties, particularly for severely declining species like Kittiwakes and Fulmars. The methodologies utilised are likely to underestimate mortality rates due to incomplete baseline data and insufficient understanding of behavioural responses.

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

From a regulatory viewpoint, the application does not fulfil the evidential threshold needed to confirm no adverse effects on the integrity of protected sites. The presence of contradictory conclusions, coupled with data deficiencies and modelling limitations, indicates that the standard of beyond reasonable scientific doubt has not been satisfied. This invokes the precautionary principle, which prohibits a lawful conclusion in support of consent.

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

Overall, the assessment is unreliable due to internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and culminate in the conclusion that the application does not meet the statutory requirements necessary for determination.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

The assessment fails to adequately address the intertwined nature of community identity and cultural heritage along the West Lewis coastline, viewing it merely as a collection of static assets instead of a vibrant cultural landscape where environment, language, and tradition are deeply interconnected. It neglects the ongoing social,

cultural, and spiritual functions of heritage within the community.

Significant sites such as the cemeteries at Dalmore, Bragar, and Barvas are treated as mere static features despite their active roles as places of burial and spiritual significance. This oversight leads to a misrepresentation of their meaning and continued use, resulting in an incomplete understanding of the cultural effects of the proposed development and ignoring their importance to community life.

Furthermore, the application disregards intangible cultural heritage, including the Gaelic language and local traditions, as well as the longstanding relationship the community maintains with the coastal environment. These vital components of the area's identity are missing from the assessment, representing a major shortfall that hampers a complete understanding of the development's cultural implications.

Concerns also extend to community rights and engagement. The Gaelic-speaking population embodies a distinct cultural identity that aligns with the characteristics of an Indigenous People. However, there has been no process of Free, Prior and Informed Consent, which undermines the integrity of the assessment and neglects established principles for involving communities in decisions impacting their cultural and environmental interests.

Additionally, the absence of a compliant Island Communities Impact Assessment is a significant procedural failure and a statutory requirement under the Islands (Scotland) Act 2018. Without this assessment, the competent authority is unable to meet its legal obligations to assess the social, cultural, and economic effects on the island community, rendering any determination legally questionable.

From a policy standpoint, these shortcomings conflict with National Planning Framework 4, particularly regarding the safeguarding of historic assets and places. By failing to consider both tangible and intangible heritage and to acknowledge living cultural practices, the application deviates from essential policy standards.

In summary, the cumulative lack of assessment regarding living heritage, intangible cultural value, community rights, and statutory responsibilities results in a substantial evidential gap. The cultural impacts associated with the development have not been adequately evaluated, leaving the application without a sufficient basis for determining the genuine cultural cost of the proposal.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual impacts associated with the proposed development is lacking and does not adequately convey the extent of change or the sensitivity of the local environment. The West Lewis coastline, characterised by its open Atlantic horizon and undeveloped landscape, possesses a strong sense of remoteness. The introduction of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally altering this character and leading to a permanent transformation of the landscape.

The application fails to fully capture the scale of this visual change. Due to their size and proximity, the turbines would dominate views from residential areas, historic sites, and frequently visited coastal locations. This would adversely affect visual amenity and undermine the essential qualities of naturalness and remoteness. The assessment does not adequately reflect the significance of this impact within such a sensitive landscape.

Concerns also arise regarding the choice and representation of visual viewpoints in the assessment. There are indications that the viewpoints selected may not adequately represent the most sensitive receptors or the worst-case scenarios, particularly in relation to important cultural heritage sites and high-value landscapes. This raises the possibility that the extent of visual impact has been downplayed, which compromises the reliability of the assessment.

Moreover, 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, connected visually and spatially to the Atlantic horizon. The assessment treats these heritage assets as isolated rather than acknowledging their interdependence, leading to an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape would disrupt these connections, altering how heritage assets are experienced and their relation to the natural horizon. This change signifies not just a visual impact but also a wider cultural and spatial harm that has not been sufficiently evaluated in the proposal.

From a policy perspective, this proposal stands in direct conflict with National Planning Framework 4, particularly concerning the protection of natural spaces and historic assets. The scale of change proposed is inconsistent with 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 compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and closeness of the turbines, their presence would be overwhelming and unavoidable. Thus, the resultant change is not merely something that can be reduced to an acceptable level through mitigation efforts; it is fundamental and permanent.

Overall, the assessment does not accurately portray 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 at odds with the necessary protections for this landscape.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and a thriving fishing industry, yet the application lacks a thorough assessment of the ecological and socio-economic impacts. It fails to provide evidence that the diverse habitats and activities in the area can be preserved without significant disruption.

One major concern is the assertion that fishing activities can be relocated without any consequences. The application does not demonstrate that there are alternative fishing grounds available, accessible, or capable of withstanding added pressure. This oversight is critical, as the potential for overfishing in other areas could have adverse economic effects on the local fishing fleet. Without a solid, evidence-based evaluation, the implications for fisheries and livelihoods remain unclear.

Additionally, the proposal poses significant risks to marine species, particularly due to the underwater noise created during construction. The use of high-energy hammer piling for extended periods will likely disturb marine life over vast areas, notably affecting species like dolphins. The anticipated disruption to a considerable portion of the local bottlenose dolphin population raises serious concerns, yet the application downplays the significance of these effects, lacking sufficient evidence to support this minimisation.

There is also a glaring inconsistency in the application regarding the need for licences to permit harm to European Protected Species, while simultaneously describing the impacts as negligible. This contradiction questions the reliability of the assessment and highlights concerns about compliance with the Habitats Regulations, especially when harm is expected to a degree that necessitates legal authorisation.

Moreover, the assessment does not adequately consider the cumulative impacts resulting from various pressures, such as habitat disturbance, noise, and the displacement of fishing activities. A comprehensive evaluation of these combined effects is essential to ascertain the overall impact on marine ecosystems and socio-economic conditions.

From a policy standpoint, the application fails to demonstrate adherence to National Planning Framework 4 and the National Marine Plan. It does not establish that the development can coexist with existing marine users or avoid unacceptable repercussions on marine biodiversity, making it impossible to conclude that the proposal represents sustainable development.

In summary, the shortcomings regarding evidence on fishing displacement, the underestimation of acoustic impacts, and the internal contradictions render the assessment incomplete and untrustworthy. These inadequacies hinder a proper evaluation of the impacts on marine life and fisheries.

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The assessment regarding onshore infrastructure is significantly lacking, failing to account for the full range of impacts associated with what constitutes a singular

integrated project. The offshore turbines and onshore works are interconnected; however, they are evaluated independently. This fragmented approach obscures the comprehensive scale of the environmental and socio-economic repercussions.

The onshore components encompass cabling across protected moorland, the construction of a substation near Stornoway, and the necessary access infrastructure traversing sensitive landscapes. These activities involve excavation in areas of deep peat, particularly within Barvas Moor, which serves as a vital carbon store and is an ecologically delicate habitat. The application does not offer a thorough assessment of these impacts, which hinders a complete understanding of the project's overall environmental footprint.

By omitting or postponing the assessment of onshore impacts, the application impedes a proper evaluation of cumulative effects. The Environmental Impact Assessment process stipulates that all project components must be considered collectively, yet the disconnection between offshore and onshore elements results in a lack of clarity regarding the combined effects on peatlands, habitats, and local communities. There are also considerable threats to sensitive habitats, including machair systems and peatland environments, which are designated for policy protection. The application fails to show that impacts on these habitats have been adequately assessed or that suitable avoidance measures have been implemented, revealing a significant evidential gap regarding biodiversity protection.

Furthermore, the routing of infrastructure through active croft land raises potential conflicts with existing land use and legal rights. The application does not provide evidence that the necessary consents or processes have been initiated, prompting concerns over deliverability and lawful execution. From a policy standpoint, the inability to assess the project comprehensively and to illustrate the protection of peatlands, habitats, and land use interests stands in contradiction to the National Marine Plan and National Planning Framework 4. The lack of demonstration that impacts can be avoided or mitigated further undermines the credibility of the application.

Overall, the separation of project elements, the absence of a comprehensive assessment, and the insufficient evidence regarding environmental and land use impacts render this section of the application incomplete and unreliable, thereby obstructing a lawful determination.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal is fundamentally flawed in its failure to meet the requirements of sustainable development, as assessed against statutory obligations, national policy, and evidential standards. This application mirrors the core issues that resulted in the 2008 rejection of the Lewis Wind Power proposal, which was deemed unacceptable due to the scale of industrialisation. Now, despite being put forth under a stronger policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing, it falls short of the necessary standards.

The evidential basis for determining this application is incomplete and unreliable. There are significant gaps in baseline data, the design envelope remains undefined, and the reliance on unspecified mitigation measures is problematic. Additionally, it overlooks essential impact pathways, including those concerning nocturnal wildlife, onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is inadequate, failing to provide a comprehensive understanding of the likely significant effects and residual impacts.

Procedural shortcomings are evident throughout the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties set forth in the Islands (Scotland) Act 2018. Furthermore, the omission of the full Social Impact Assessment constitutes a material failure. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unsuitable for determination.

Moreover, the proposal conflicts directly with National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural spaces, or cultural heritage, nor does it establish that health and wellbeing impacts are acceptable. There is also a lack of evidence for a net economic benefit, particularly due to the absence of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been properly evaluated, obscuring potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and potentially severe. Assessments related to marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in various areas. The evidential requirements needed to exclude adverse effects beyond reasonable scientific doubt have not been satisfied, necessitating the application of the precautionary principle, which prevents a lawful determination that impacts are acceptable.

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

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

In light of these considerations, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is entirely refused.

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: 5E9C96C7

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

Dear Sir/Madam

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

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

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

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

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents significant deficiencies, leading to an unreliable account of the likely environmental effects associated with the proposal. A notable issue is the reliance on a flexible Project Design Envelope, which lacks specific turbine dimensions, layouts, or configurations. This creates uncertainty and hinders the assessment of a worst-case scenario. Consequently, the integrity of the evaluation is compromised, making it difficult for the public and the competent authority to comprehend the true environmental impacts.

Moreover, the application is heavily dependent on mitigation measures, monitoring strategies, and management plans that have yet to be established. Seeking consent based on the premise that potential environmental harm will be addressed later prevents any substantial evaluation of the effectiveness of these measures and the assessment of residual impacts. Such deferral of critical information to post-consent stages contradicts the objectives of the Environmental Impact Assessment regime, which necessitates that significant effects and mitigation strategies be clearly outlined before determination.

There are also notable evidential gaps, including insufficient baseline data, methodological limitations, and a reliance on assumptions rather than site-specific evidence. This lack of robust supporting data results in uncertainty regarding the magnitude and significance of impacts, especially in instances where negligible or non-significant effects are asserted. The inadequacy of information hinders a proper understanding of cumulative and worst-case impacts, introducing scientific uncertainty that fails to meet statutory requirements.

As a result, the application does not satisfy the evidential threshold needed under the Habitats Regulations to eliminate adverse effects beyond reasonable scientific doubt. This situation invokes the precautionary principle, particularly concerning protected species and sensitive habitats. Furthermore, the proposal does not demonstrate alignment with the National Planning Framework 4, including obligations related to biodiversity protection and environmental integrity, as it cannot be demonstrated that impacts have been thoroughly assessed or that appropriate safeguards exist.

In conclusion, the combination of reliance on an undefined design envelope, absence of defined mitigation measures, and gaps in baseline data renders the Environmental Impact Assessment Report incomplete and unreliable. These shortcomings prevent a lawful and robust assessment of environmental effects, leaving the competent authority unable to determine the application based on the information provided.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species within the West Lewis coastal environment is fundamentally flawed, leading to an incomplete and unreliable understanding of ecological receptors. This area, known for its biological activity and sensitivity, is not adequately represented by the baseline data provided. The methodologies employed fail to effectively capture the presence, behaviour, and habitat utilisation of crucial species. Consequently, the assessment falls short of

offering a solid evidential basis for evaluating potential impacts.

One significant oversight pertains to otters, a species protected under European law, which are not sufficiently acknowledged in their use of coastal regions for foraging and movement. The assessment does not adequately consider their core foraging range and behavioural patterns. This oversight raises concerns about the evaluation of potential construction disturbances, noise, and increased activity, leaving the conclusions regarding the absence of significant effects on otters unsubstantiated.

Additionally, the assessment of basking sharks is compromised by an overreliance on aerial surveys, which introduce considerable detection bias, especially in the prevailing Atlantic conditions. This method is likely to underestimate the presence of these sharks compared to established land-based observations that reveal frequent utilisation of the waters. Such omissions lead to an incomplete baseline and compromise the reliability of the conclusions drawn.

These methodological shortcomings mean that assertions of negligible or non-significant effects are founded on assumptions rather than solid evidence. Furthermore, the lack of adequate baseline data hinders meaningful assessments of cumulative and indirect impacts, including seasonal changes and broader ecosystem interactions. This situation creates uncertainty about the actual risks posed to marine species and their habitats.

From a regulatory standpoint, the application does not fulfil the criteria set by the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to properly identify and evaluate protected species. The uncertainty introduced by these deficiencies prevents the exclusion of adverse effects beyond reasonable scientific doubt, thus necessitating the invocation of the precautionary principle. In light of these issues, it is clear that consent cannot be legally granted.

In summary, the assessment's unreliability stems from incomplete baseline data, inadequate methodologies, and unsupported conclusions. These critical flaws obstruct a thorough evaluation of impacts on marine ecology and protected species, reinforcing the conclusion that the application lacks a sufficient evidential foundation.

ORNITHOLOGY AND SEABIRD IMPACTS

The proposed development raises significant concerns regarding its impact on the environment, particularly in relation to internationally important seabird populations on the west coast of the Isle of Lewis. The application does not sufficiently demonstrate that these species, many of which are already declining, will not be adversely affected. Located within key foraging areas and migratory pathways, the site poses risks that the ornithological assessment fails to adequately address, such as displacement, collision risk, and habitat loss.

Moreover, there exists a fundamental contradiction within the application itself. The developer asserts that there will be no significant adverse effects while also advancing

a case for Habitats Regulations derogation, a measure only necessitated when significant harm is anticipated. This inconsistency undermines the reliability of the assessment, casting doubt on its conclusions which are not supported by robust underlying evidence.

The assessment particularly lacks sufficient evidence regarding the effects on seabirds associated with protected sites like the Lewis Peatlands and St Kilda. The critical feeding grounds for these species are inadequately acknowledged, and the modelling approaches used introduce a level of uncertainty, especially for species that are in severe decline, such as Kittiwakes and Fulmars. Methodologies applied in the assessment are likely to underestimate potential mortality, particularly given the incomplete baseline data and insufficient understanding of behavioural responses.

Additionally, placing turbines within a recognised migratory corridor poses an elevated risk, creating barriers in the primary flight path of species migrating between the United Kingdom and Iceland. The application does not thoroughly evaluate the long-term consequences of increased 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 required to establish that there will be no adverse effect on the integrity of protected sites. The presence of contradictory conclusions, combined with significant data gaps and limitations in modelling, indicates that the standard of beyond reasonable scientific doubt has not been fulfilled. This situation invokes the precautionary principle, which prevents reaching a lawful conclusion in favour of consent.

Ultimately, the identified deficiencies illustrate non-compliance with National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to demonstrate that internationally important seabird populations will remain unaffected places the proposal directly in conflict with national policy.

In conclusion, the assessment is fundamentally flawed due to its internal inconsistencies, methodological weaknesses, and lack of adequate evidence. These deficiencies hinder a comprehensive evaluation of the potential impacts and support the overall finding that the application does not fulfil the statutory requirements necessary for determination.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The lack of transparency regarding the Social Impact Assessment raises significant concerns about the lawful evaluation of social impacts, health, and wellbeing associated with the proposed development. Although the developer engaged local residents through focus groups, the full report of this assessment remains unpublished, creating a substantial evidential gap. This absence impedes both public understanding and the competent authority's ability to grasp the full scope of social risks revealed by the developer's own research.

Summaries suggest that local residents are experiencing notable levels of stress, anxiety, and concern due to the scale and proximity of the proposal. These impacts, derived from direct engagement with the community, are factual rather than speculative. However, the non-disclosure of the complete assessment restricts proper examination of the findings and hampers the determination of their relevance within the decision-making process.

Moreover, there is recognition that the proposal poses a perceived threat to community identity and cohesion, with findings indicating potential "cultural loss." Despite this identification, such impacts have not been fully incorporated into the main application nor given the appropriate consideration they warrant. The failure to provide the entire Social Impact Assessment effectively obscures the genuine human and social costs associated with the development.

This deficiency in transparency significantly undermines the Environmental Impact Assessment process. An exhaustive understanding of social, economic, and health impacts is crucial for developments of this magnitude, particularly when community character and functionality may be adversely influenced. The lack of a complete dataset in the application fails to provide a comprehensive evidential basis for evaluating 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. Development projects are required to foster positive health outcomes while mitigating adverse effects; however, the existing evidence suggests negative impacts that remain inadequately disclosed. Without access to the full assessment, compliance with these policy requirements cannot be substantiated.

The procedural ramifications are considerable, as the competent authority is unable to conduct a thorough socio-economic and health evaluation without the complete Social Impact Assessment. This omission constitutes a material shortfall within the application and reflects a failure to satisfy the evidential standards of the Environmental Impact Assessment framework.

In summary, the withholding of the full Social Impact Assessment, in conjunction with the documented evidence of existing negative impacts, results in an incomplete and unreliable evaluation. This situation precludes a lawful determination and supports the conclusion that the application lacks sufficient information to proceed.

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 proposal involves substantial seabed preparation and installation works within a high-energy Atlantic environment, yet it lacks fully developed Construction Environmental Management Plans or Pollution Prevention Plans. This results in an incomplete assessment of construction and pollution risks, hindering any meaningful evaluation of likely environmental effects. Instead, the application depends on undefined future mitigation and contingency measures, which raises concerns about their adequacy and effectiveness in such a sensitive environment.

The West Lewis coastline is home to clean coastal waters and important habitats that are vulnerable to sediment disturbance and contamination. While the application acknowledges risks like sediment mobilisation and accidental chemical or oil spills, it does not provide sufficient detail on prevention, control, or monitoring measures. Furthermore, there is uncertainty surrounding the scale and behaviour of sediment plumes that could arise from seabed disturbance and cable installation. Without robust modelling and clearly defined management strategies, it is impossible to assess the extent, duration, or ecological effects of these impacts, including potential consequences for sensitive marine species and habitats identified in the wider assessment.

Compounding these issues is the absence of detailed emergency response procedures. By deferring contingency planning to a post-consent stage, the application undermines the ability of the competent authority to evaluate whether appropriate safeguards are in place to handle pollution events. This introduces procedural risks and conflicts with the requirements of the Environmental Impact Assessment regime, which mandates that likely significant effects and mitigation must be assessed prior to consent. The application also fails to demonstrate compliance with environmental protection and water quality policy requirements. Collectively, these deficiencies highlight that the absence of defined mitigation measures and the lack of detailed management plans render the assessment materially inadequate, preventing a robust evaluation of construction and pollution risks.

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a vibrant marine ecosystem and an active fishing industry, which the application does not sufficiently protect or maintain from significant disruption. The assessment of fisheries and marine life lacks a robust evaluation of the ecological and socio-economic impacts involved. A critical concern lies in the application's assumption that fishing activities can be displaced without consequence. There is no evidence provided to show that alternative fishing grounds are available, accessible, or capable of sustaining the additional pressure that such displacement would entail. This lack of information is crucial, as it poses a risk of overfishing in other areas, potentially leading to wider economic implications for the local fishing fleet.

Moreover, the proposal raises substantial risks to marine species, especially due to underwater noise generated during construction activities. High-energy hammer piling is anticipated to create disturbances over extensive distances, adversely impacting

species such as dolphins. The predicted disruption to a significant portion of the local bottlenose dolphin population generates serious concerns, yet these effects are downplayed in the application without adequate supporting evidence.

The application contains a notable inconsistency where the necessity of licences to permit harm to European Protected Species is acknowledged, while simultaneously characterising impacts as negligible. This contradiction undermines the credibility of the assessment and raises issues regarding compliance with the Habitats Regulations, particularly where harm is foreseen that requires legal authorisation.

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

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

In summary, the deficiencies in the evidence concerning 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.

DARK SKIES AND NOCTURNAL WILDLIFE

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

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

In addition, there is a critical absence of evaluation regarding the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel are especially sensitive to artificial lighting due to phototaxis, which can cause

disorientation and increase collision risks. The application does not provide a lighting impact assessment or a phototaxis study, resulting in an inadequate assessment of how aviation lighting might affect these species or potentially raise mortality rates.

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

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

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

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

TOURISM

The failure to assess the implications of the proposed development on tourism represents a significant oversight, given the economic dependency of the Isle of Lewis on this sector. Tourism has increased notably, with its contribution rising from £65 million in 2017 to over £81.5 million, thereby supporting more than 1,000 jobs and accounting for up to 16% of the local economy. The absence of a thorough analysis regarding how large-scale offshore infrastructure might alter visitor numbers and behaviours hinders an accurate understanding of the potential impacts on economic contribution.

Tourism thrives on the area's wild coastline, near-pristine landscapes, and dark skies, all of which provide a unique visitor experience. The application acknowledges that 86% of tourists are attracted by the scenery, yet it does not offer a quantified assessment of how the industrialisation of the seascape could detract from these vital attractions. The lack of consideration for environmental quality, particularly concerning unspoiled landscapes and dark skies, further complicates the evaluation of the tourism sector's potential decline.

Moreover, the failure to incorporate a Dark Skies Assessment leaves a critical gap in

understanding the effects on nature-based and astro-tourism, both of which are emerging markets that could significantly benefit the local economy. In an island community where economic diversification is limited, this lack of assessment has broader ramifications for employment, local businesses, and community sustainability.

The submission also falls short in meeting policy requirements, failing to demonstrate adherence to the National Planning Framework 4 regarding economic impacts and the necessity to show net benefit. It conflicts with strategic objectives that prioritise tourism as a growth sector and lacks sufficient evidence for the competent authority to evaluate the economic consequences of the proposal adequately.

Taken collectively, the deficiencies in quantifying tourism impacts, assessing the environmental drivers of visitor behaviour, and recognising the economic vulnerabilities of the island culminate in a significant evidential gap. This situation precludes a thorough evaluation of the economic effects and suggests that the application is incomplete.

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the requirements of sustainable development as defined by statutory duties, national policy, and evidential standards. It echoes the central issues that led to the refusal of the Lewis Wind Power proposal in 2008, where the level of industrialisation was deemed unacceptable. This current application is presented under a more robust policy framework that prioritises biodiversity, peatland protection, landscape integrity, and the wellbeing of communities.

There are significant shortcomings in the evidential basis provided for determination. Critical gaps exist in baseline data, and the use of an undefined design envelope raises further concerns. The application relies on unspecified mitigation measures and omits crucial impact pathways, including those affecting nocturnal wildlife, the full scope of onshore infrastructure, and tourism effects. Consequently, the Environmental Impact Assessment is incomplete, failing to adequately convey the likely significant effects or residual impacts.

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

This proposal conflicts directly with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural environments, and cultural heritage, nor does it sufficiently address health and wellbeing impacts or prove a net economic benefit, particularly due to the lack of tourism impact modelling. The cumulative impacts of both offshore and onshore elements have not been assessed

thoroughly, clouding the understanding of effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the project are uncertain and potentially significant. Assessments regarding marine ecology, seabirds, protected species, and marine mammals are incomplete and inconsistent in parts. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, invoking the precautionary principle and preventing a lawful conclusion that impacts can be deemed acceptable.

Moreover, the proposal is set to 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 all permanent effects that cannot be effectively mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The combination of information deficiencies, conflicts with policy, and unresolved environmental risks obstructs a lawful, evidence-based decision. It is imperative that the competent authority either refuses consent on these grounds or enforces the relevant regulatory measures to obtain the missing information. Therefore, I formally request that the application for the Spiorad na Mara Offshore Wind Farm is rejected in its entirety.

Additional Comments

I visit the island twice a year with my husband to enjoy the islands delicate and rare eco systems and ecology.

Our fear is the impact on this delicate eco system and the loss of power getting it to where it is going to be used.

We are an island nation with space to build this type of infrastructure far closer to the population centres where the power is being consumed.

It's utter insanity to build this where 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: 50B9B125

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, submitted under the relevant marine licensing and Environmental Impact Assessment frameworks. The objection arises from a detailed examination of the Environmental Impact Assessment Report and accompanying documents, which reveal significant deficiencies in planning, environmental considerations, cultural aspects, and procedural compliance. Situated off the west coast of the Isle of Lewis, an area characterised by its Atlantic-facing coastline and strong cultural heritage, the proposed development raises critical issues regarding its alignment with statutory obligations, national policy, and the fundamental principles of sustainable development.

The application does not present an adequate evidential foundation for a lawful determination. There is a notable absence of essential environmental data, and the baseline information provided is both limited and inconsistent. Several key elements of the proposal remain undefined. Furthermore, the adoption of a flexible design framework obstructs a clear comprehension of the likely significant effects, while the reliance on unspecified mitigation measures precludes an assessment of their potential effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of the environmental, cultural, or community impacts, and assertions of negligible or non-significant effects lack robust evidential support.

There are pronounced and substantive conflicts with policy. The proposal does not align with the National Marine Plan, the Environmental Impact Assessment regime, or National Planning Framework 4, particularly concerning biodiversity, natural habitats, cultural heritage, and overall health and wellbeing. It does not adequately demonstrate compliance with national obligations to preserve biodiversity, address climate considerations, and uphold environmental integrity. These discrepancies directly challenge the statutory criteria necessary for consent and hinder the competent authority's capacity to determine the acceptability of the development from a policy perspective.

The unprecedented scale of the proposal, characterised by large turbines positioned in close proximity to the shore, raises substantial concerns about landscape capacity, visual impact, and broader environmental consequences. Collectively, the lack of sufficient information, the reliance on undefined mitigation strategies, the evidential inadequacies, and the clear policy non-compliance indicate that the application is incomplete and unable to support a lawful determination. Under these circumstances, the precautionary principle must be invoked.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report 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 application fails to provide an adequate assessment of alternatives, which is essential under the Environmental Impact Assessment regime. Instead of delivering a

systematic and reasoned evaluation of viable alternatives based on their environmental impacts, the submission merely recounts the project's development history. This narrative approach does not sufficiently demonstrate that less harmful options have been properly identified, evaluated, and chosen over more damaging solutions.

There is a conspicuous lack of transparent and evidence-based comparisons regarding potential offshore locations, development scales, or design configurations. Notably, the application does not show that the developer has genuinely considered positioning turbines further offshore, where impacts on visual aesthetics, ecology, and coastal areas would likely be diminished. Given the sensitivity of the West Lewis coastline and the critical role that distance from the shore plays in impact assessment, the absence of such an analysis precludes any determination that the proposed siting is the least harmful option available.

Moreover, the shortcomings extend to the assessment of cable routing and landfall, with insufficient evidence that alternative routes have been adequately investigated to avoid or lessen impacts on sensitive receptors, including culturally and spiritually significant locations like Barvas Cemetery. The lack of a clear avoidance strategy and absence of comparative analysis point to a failure to implement mitigation by design, relying instead on measures that are applied after the design phase.

Consequently, the application does not prove that environmental harm has been minimised through site selection, layout, and infrastructure routing. This represents a significant deviation from the established mitigation hierarchy, inhibiting the competent authority from determining whether more appropriate and less harmful alternatives are available. Without a rigorous alternatives assessment, it is impossible to assert that the proposal is sustainable or compliant with relevant policies.

From a policy standpoint, this deficiency also compromises adherence to National Planning Framework 4, particularly in relation to the protection of natural environments, cultural heritage, and community wellbeing. The failure to conduct a structured and comparative assessment is a material shortcoming that contributes to the conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The assessment of marine ecology and protected species fails to provide a complete and reliable understanding of the ecological receptors in the West Lewis coastal environment. This region is biologically active and sensitive, yet the baseline data is inadequate. The methodologies used do not adequately capture species presence, behaviour, and habitat use, which leads to an unsound evidential basis for evaluating impacts.

Specifically, the assessment neglects to properly recognise and assess the presence of otters, a European Protected Species, which actively use coastal areas for foraging and movement. This oversight includes a lack of consideration for their core foraging range

and behavioural patterns. Consequently, the potential effects of construction disturbance, noise, and increased activity on this species have not been thoroughly evaluated, undermining claims of negligible effects.

There are also significant deficiencies in the assessment of basking sharks, as reliance on aerial surveys creates a detection bias, particularly in Atlantic conditions. This method likely underestimates the presence of basking sharks, especially compared to established land-based observations showing frequent use of these waters. The failure to incorporate or properly consider such data results in an incomplete baseline and diminishes the reliability of the conclusions drawn.

These methodological shortcomings mean that any conclusions regarding negligible or non-significant effects are based more on assumptions than on solid evidence. The lack of sufficient baseline data hampers meaningful assessments of cumulative and indirect impacts, such as seasonal variations and interactions within the wider ecosystem. This creates uncertainty about the actual risks to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the Environmental Impact Assessment requirements or the National Planning Framework 4, as it has not properly identified or assessed protected species. This uncertainty prevents a definitive exclusion of adverse effects beyond reasonable scientific doubt, necessitating the application of the precautionary principle. Therefore, consent cannot be lawfully granted.

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

ORNITHOLOGY AND SEABIRD IMPACTS

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

A critical inconsistency arises from the developer's assertion of no significant adverse effects, which contradicts the pursuit of a Habitats Regulations derogation case, a process necessitated only when significant harm is anticipated. This contradiction raises serious concerns regarding the assessment's reliability and suggests that its conclusions lack adequate support from the underlying evidence. Moreover, the

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

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

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

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

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

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, hindering both public understanding and the competent authority's ability to grasp the full extent of the social risks identified through the developer's research. Summaries reveal that residents are currently experiencing stress, anxiety, and concern due to the scale and proximity of the proposal, with these effects arising from direct engagement rather than speculation. The withholding of the complete assessment limits scrutiny of these findings, obstructing the determination of their importance within the decision-making process.

Furthermore, there is evidence indicating that the proposal threatens community identity and cohesion, with findings from the developer highlighting "cultural loss." Despite this recognition, these impacts have not been adequately integrated into the

main application or given proper consideration. This omission obscures the true human and social costs associated with the development, and undermines the Environmental Impact Assessment process. A thorough understanding of the social, economic, and health impacts is vital for developments of such scale, particularly when community character and functioning may be affected. Without the complete dataset, the application lacks a comprehensive evidential basis necessary for evaluating the balance between benefits and harm.

From a policy standpoint, the application does not demonstrate compliance with National Planning Framework 4 regarding health and wellbeing. Development must foster positive health outcomes and prevent harm, yet available evidence indicates existing adverse effects that have not been fully disclosed. The absence of the full assessment means that compliance with this policy cannot be established.

The procedural ramifications are significant. The competent authority is unable to perform a robust socio-economic and health evaluation in the absence of the full Social Impact Assessment. This represents a material omission within the application and constitutes a failure to satisfy the evidential requirements of the Environmental Impact Assessment framework. Collectively, the non-disclosure of the complete Social Impact Assessment, alongside evidence of ongoing adverse impacts, renders the assessment incomplete and unreliable. This situation obstructs a lawful determination and reinforces the conclusion that the application is inadequately supported by information.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of seascape, landscape, and visual impacts is inadequate and does not accurately capture the scale of change or the sensitivity of the surrounding environment. The West Lewis coastline is characterised by its open Atlantic horizon and undeveloped nature, contributing to a strong sense of remoteness. The proposed installation of large-scale turbines in proximity to the shoreline would create a continuous and significant industrial presence, fundamentally changing this character and leading to a permanent and irreversible alteration of the landscape.

Moreover, the application falls short in conveying the magnitude of the visual change. Given their scale and proximity, the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, thereby directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. The assessment does not sufficiently represent this level of impact or its significance in the context of such a sensitive landscape.

There are also concerns regarding the methodology employed in the selection and presentation of visual viewpoints. Evidence indicates that these viewpoints may not fully depict the most sensitive receptors or the worst-case scenarios, particularly concerning key cultural heritage sites and high-value landscapes. This shortcoming suggests that the magnitude of visual impact may be understated, undermining the reliability of the assessment.

A significant gap exists in the evaluation of the interconnected relationships among landscape, seascape, and cultural heritage. Prominent sites such as the Calanais Standing Stones and other Scheduled Monuments are integral to a broader landscape framework, linked by visual and spatial relationships to the Atlantic horizon. The assessment erroneously treats these sites as isolated, failing to acknowledge their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is at odds with National Planning Framework 4, particularly regarding the protection of natural places and historic assets. The extent of the proposed changes is inconsistent with the obligation 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 also apparent that the identified impacts cannot be effectively mitigated. Given the scale, height, and proximity of the turbines, their presence would be both dominant and unavoidable. Consequently, the resulting change is fundamentally permanent, rather than something that could be reduced to an acceptable level through mitigation efforts.

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

CONSTRUCTION AND POLLUTION RISKS

The proposal presents significant deficiencies in its assessment of construction and pollution risks, making it impossible to fully evaluate the likely environmental effects. The planned works include extensive seabed preparation and installation activities within a high-energy Atlantic environment. However, the lack of fully developed Construction Environmental Management Plans or Pollution Prevention Plans raises serious concerns. The application leans on mitigation and contingency measures that are to be defined after consent, which undermines any meaningful assessment of their potential adequacy and 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 crucial habitats that are susceptible to both sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and potential chemical or oil spills, it fails to provide adequate detail on

the methods for prevention, control, or monitoring of these risks.

Moreover, there is significant uncertainty surrounding the scale and behaviour of sediment plumes that may result from seabed disturbance and cable installation. Without comprehensive modelling and well-defined management strategies, it remains impossible to ascertain the extent, duration, or ecological impacts of these disturbances. This uncertainty also applies to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

The lack of comprehensive emergency response procedures further exacerbates these concerns. By postponing contingency planning to a post-consent stage, the application limits the assessment of whether sufficient safeguards are in place to address pollution incidents. This introduces procedural risks and compromises the ability of the competent authority to evaluate environmental protection measures during the determination process.

From a regulatory standpoint, the postponement of essential environmental safeguards contravenes the requirements of the Environmental Impact Assessment regime. It is imperative that likely significant effects and their mitigations are assessed before consent is granted; failure to provide this information means a lawful determination cannot be reached. Furthermore, the application does not demonstrate compliance with policy requirements regarding environmental protection and water quality.

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

FISHERIES AND MARINE LIFE

The waters off the West Lewis coast are home to a diverse marine ecosystem and support an active fishing industry. Despite this, the application does not adequately address the potential ecological or socio-economic impacts, failing to ensure that these vital uses and habitats can be protected without significant disruption. A major concern is the unsubstantiated assumption that fishing activities can be displaced without negative consequences. The application lacks evidence to confirm that alternative fishing grounds are available and capable of supporting the increased pressure that such displacement would cause. This oversight is critical, as it raises the risk of overfishing in other areas and may lead to broader economic implications for the local fishing fleet. Without a detailed and evidence-based assessment, the effects on fisheries and local livelihoods remain unclear.

Moreover, the proposal poses significant risks to marine species, especially due to the underwater noise generated during construction. The high-energy hammer piling anticipated over an extended period is likely to disturb marine life across considerable distances, notably affecting species like dolphins. The potential disruption to a

significant portion of the local bottlenose dolphin population is alarming, yet the application downplays these risks, lacking the necessary supporting evidence to justify such minimisation.

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

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

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

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application fails to provide a complete assessment of the onshore infrastructure, neglecting to consider the full range of impacts associated with what constitutes a single integrated project. The offshore turbines and onshore works are interdependent; however, the separate evaluations lead to a fragmented understanding that obscures the true scale of environmental and socio-economic effects.

Key components of the onshore development include cabling that crosses protected moorland, the construction of a substation located near Stornoway, and the necessary access infrastructure through sensitive landscapes. These activities involve excavation in areas of deep peat, especially within Barvas Moor, an ecologically sensitive habitat and significant carbon store. The lack of a comprehensive assessment of these impacts inhibits a complete understanding of the project's overall environmental footprint.

By deferring or omitting the assessment of onshore impacts, the application fails to allow for a proper evaluation of cumulative effects. The Environmental Impact Assessment process mandates that all components of a project be considered collectively; thus, the disjointed assessments of offshore and onshore elements prevent a full understanding of the combined impacts on peatlands, habitats, and local

communities.

Moreover, there are substantial risks to sensitive habitats, such as machair systems and peatland environments, which are recognised for their policy protection. The application does not adequately demonstrate that the impacts on these critical habitats have been thoroughly assessed or that effective avoidance measures are in place, resulting in a significant evidential gap concerning biodiversity protection.

The proposal additionally raises serious concerns about carbon balance. Disturbance of peatland can release stored carbon, potentially resulting in a carbon debt that undermines the objectives of renewable energy development. The application does not sufficiently address this critical issue or provide evidence that the overall carbon balance remains favourable.

Furthermore, routing the infrastructure through active croft land poses potential conflicts with existing land use and legal rights. The application lacks evidence indicating that the required consents or processes have been initiated, raising doubts about the feasibility and legality of implementation.

From a policy standpoint, the project's fragmented assessment and the failure to safeguard peatlands, habitats, and land use interests are at odds with the National Marine Plan and National Planning Framework 4. The inability to show that impacts can be effectively avoided or mitigated further weakens the application.

Overall, the separation of project components, the absence of a thorough assessment, and the lack of evidence regarding environmental and land use impacts render this aspect of the application incomplete and unreliable, thus preventing a lawful determination.

DARK SKIES AND NOCTURNAL WILDLIFE

The absence of any assessment regarding dark skies and nocturnal wildlife represents a significant evidential gap within the Environmental Impact Assessment. The West Lewis coastline is noted for its exceptionally dark skies, which are crucial for maintaining environmental quality, cultural identity, and tourism value. The proposed development includes permanent red aviation lighting, which would be visible over long distances and create a continuous and intrusive "wall of light" effect across the western horizon, fundamentally changing the night-time environment.

The application fails to evaluate the impact of this lighting on visual amenity, landscape character, or the experiences of residents and visitors. This is particularly concerning given the importance of dark skies to the area's identity and the emerging tourism sector focused on astro-tourism. The failure to consider these potential impacts creates a clear deficiency in the overall landscape and environmental assessment.

Moreover, the assessment neglects to consider the effects on nocturnal wildlife. Species such as Manx Shearwater, European Storm Petrel, and Leach's Storm Petrel

exhibit sensitivity to artificial lighting due to phototaxis, which can lead to disorientation and increased risks of collision. The application lacks any lighting impact assessment or phototaxis study, thus failing to evaluate how aviation lighting may affect these species or increase their mortality rates.

The reliance on daytime survey data within the ornithological assessment further compounds this oversight, as it does not account for nocturnal activity or related risks. Species like Kittiwakes, which may forage or migrate at night, are also at risk of disorientation from artificial lighting; however, this potential risk has not been assessed. The absence of site-specific night-time data creates a significant gap in understanding the ecological impacts of the proposal.

Without a proper assessment of nocturnal impacts, it becomes impossible to ascertain whether protected species or designated sites may be adversely affected. The evidential standard required to rule out adverse effects beyond reasonable scientific doubt cannot be achieved, thereby invoking the precautionary principle and hindering a lawful determination.

From a policy perspective, these omissions are inconsistent with National Planning Framework 4 concerning the protection of natural places and the maintenance of environmental quality. Additionally, the lack of assessment undermines the broader evaluation of landscape and seascape impacts, as the night-time character is integral to the environment.

In conclusion, the lack of evaluation regarding dark skies and nocturnal wildlife constitutes a serious evidential shortcoming. The deficiency in 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 the criteria for sustainable development, as determined by statutory obligations, national policy, and evidential standards. This application mirrors the primary concerns that led to the rejection of the Lewis Wind Power proposal in 2008, where the unacceptable scale of industrialisation was identified. Notably, it is now presented under a more robust policy framework that emphasises biodiversity, peatland protection, landscape integrity, and community wellbeing.

Moreover, the application lacks a comprehensive and reliable evidential foundation for its determination. Significant gaps exist in baseline data, the use of an undefined design envelope remains, and there is a reliance on unspecified mitigation measures. Essential impact pathways have been omitted, including those affecting nocturnal wildlife, the complete onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a full understanding of likely significant effects or residual impacts.

Procedural shortcomings are evident as well. The failure to provide a compliant Islands Communities Impact Assessment breaches statutory duties under the Islands (Scotland) Act 2018. Additionally, the non-disclosure of the full Social Impact Assessment constitutes a critical omission. Such deficiencies hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for consideration.

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

Environmental risks associated with the proposal remain uncertain and potentially significant. Assessments concerning marine ecology, seabirds, protected species, and marine mammals are either incomplete or contain internal inconsistencies. The evidential standard required to exclude adverse effects beyond reasonable scientific doubt has not been satisfied, thereby invoking the precautionary principle and precluding a lawful conclusion on the acceptability of impacts.

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

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

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

Yours faithfully,

[Redacted]

I do not consent to publication of my personal data. In accordance with UK GDPR and the Data Protection Act 2018, and the personal-data exemptions in FOISA s.38 / EIR(S) reg. 11, please redact all personal contact details before publishing. If a name must appear, publish my name only and no contact details. Individual Letter Reference: B0A63DE0

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

Dear Sir/Madam

This letter serves as a formal objection to the proposed Spiorad na Mara Offshore Wind Farm application, submitted under the relevant marine licensing and Environmental Impact Assessment regimes. The objection is grounded in an analysis of the Environmental Impact Assessment Report and accompanying documents, highlighting significant deficiencies in planning, environmental considerations, cultural aspects, and procedural adherence. The proposed development is located off the west side of the Isle of Lewis, characterised by its Atlantic-facing coastline, relatively unspoiled environment, and strong cultural identity. The proposal's scale, design, and proximity to the shoreline raise critical concerns regarding its alignment with statutory requirements, national policy, and the principles of sustainable development.

The application lacks an adequate evidential basis necessary for a lawful determination. Essential environmental data is absent, baseline information is both limited and inconsistent, and several key elements of the proposal remain undefined. The employment of a flexible design framework obscures the understanding of likely significant effects, while the reliance on unspecified mitigation measures prevents an assessment of their effectiveness. Consequently, the documentation fails to facilitate a comprehensive understanding of environmental, cultural, or community impacts, and the assertions of negligible or non-significant effects are not underpinned by robust evidence.

There are notable and substantial conflicts with existing policy. The proposal appears to contradict the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural environments, cultural heritage, and health and wellbeing. It does not sufficiently demonstrate that national requirements aimed at protecting biodiversity, climate interests, and environmental integrity can be fulfilled. These conflicts are directly related to the statutory tests necessary for consent, thereby undermining the competent authority's ability to conclude that the development meets acceptable policy standards.

The unprecedented scale of the proposal raises significant concerns regarding landscape capacity, visual impact, and environmental repercussions. With large turbines situated close to the shoreline, the application's deficiencies—including insufficient information, reliance on undefined mitigation strategies, and evident policy non-compliance—render it incomplete and incapable of supporting a lawful determination. In light of these circumstances, the precautionary principle should be applied.

ENVIRONMENTAL IMPACT ASSESSMENT ADEQUACY

The Environmental Impact Assessment Report presents several significant deficiencies that undermine its reliability and completeness. Notably, the proposal's use of a flexible Project Design Envelope lacks commitment to specific turbine dimensions, layouts, or configurations. This introduces uncertainty and obstructs the application of a worst-case scenario, consequently compromising the integrity of the assessment. As a result, the presented impacts may not accurately represent the development that will ultimately be constructed, which prevents both the public and the competent authority from fully grasping the extent of environmental effects.

Furthermore, the application is heavily reliant on mitigation measures, monitoring strategies, and management plans that have not yet been defined. Seeking consent on the premise that environmental harm will be managed later impedes meaningful evaluation of the effectiveness of these measures and the assessment of any residual impacts. This approach, which defers crucial information to post-consent stages, is procedurally unacceptable and contradicts the intent of the Environmental Impact Assessment regime, which necessitates the clear establishment of likely significant effects and mitigation prior to decision-making.

Evidential gaps are also evident, including deficiencies in baseline data, limitations in methodology, and an overreliance on assumptions rather than site-specific evidence. Such shortcomings lead to uncertainties 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 impacts, generating scientific uncertainties that are incompatible with statutory requirements.

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

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

ASSESSMENT OF ALTERNATIVES

The inadequacy of the alternatives assessment is critical and fails to fulfil the statutory requirements of the Environmental Impact Assessment framework. The application does not offer a structured and reasoned comparison of feasible alternatives based on their environmental consequences. Instead, it provides a narrative of how the project

has evolved, which does not adequately demonstrate that less harmful options have been identified, assessed, and chosen over more damaging alternatives.

There is a notable absence of transparent, evidence-based evaluations regarding alternative offshore locations, development scales, or design configurations. The developer has not convincingly explored the possibility of placing turbines further offshore, where visual, ecological, and coastal impacts would likely be lessened. The West Lewis coastline's sensitivity and the significance of the proximity to the shore in determining impact highlight the necessity of such an analysis. Without it, one cannot conclude that the proposed siting is the least damaging option available.

Furthermore, this deficiency extends to the routing of cables and the assessment of landfall, as there is a lack of adequate evidence indicating that alternative routes have been thoroughly examined to avoid or reduce impacts on sensitive receptors, including culturally and spiritually important sites like Barvas Cemetery. The absence of a clear avoidance strategy, coupled with a lack of comparative analysis, suggests that mitigation by design has not been implemented, leaving reliance on post-design mitigation measures.

Consequently, the application fails to illustrate that environmental harm has been minimised through appropriate site selection, layout, and infrastructure routing. This represents a breach of the established mitigation hierarchy, impeding the competent authority's ability to assess whether less harmful and more suitable alternatives are available. Without a rigorous assessment of alternatives, it is impossible to determine if the proposal is sustainable or compliant with policy.

From a policy standpoint, these deficiencies compromise adherence to National Planning Framework 4, particularly concerning the protection of natural places, cultural heritage, and community wellbeing. The lack of a structured and comparative assessment is a significant omission that contributes to the overall conclusion that the application has not undergone adequate evaluation and cannot support a lawful determination.

MARINE ECOLOGY AND PROTECTED SPECIES

The evaluation of marine ecology and protected species has significant deficiencies that compromise its reliability and completeness. The West Lewis coastal environment is biologically active and sensitive, yet the baseline data collected is insufficient. The methodologies used do not adequately capture the presence, behaviour, and habitat usage of various species, leading to a lack of sound evidence for assessing potential impacts.

One major oversight is the treatment of otters, which are recognised as a European Protected Species. The application does not properly acknowledge their active use of coastal areas for foraging and movement. Ignoring their core foraging range and behavioural habits means that the assessment fails to evaluate the impacts of construction disturbance, noise, and increased human activity on these animals. This

gap undermines any conclusions drawn about the absence of significant effects on otters.

There are also substantial weaknesses in the assessment of basking sharks, where reliance on aerial surveys can lead to significant detection bias, particularly under Atlantic conditions. This methodology likely underrepresents the presence of basking sharks, especially when compared to established land-based observations that indicate frequent utilisation of these waters. The failure to integrate or adequately consider such crucial data further contributes to an incomplete baseline and diminishes the reliability of the conclusions reached.

These methodological flaws result in conclusions regarding negligible or non-significant effects being based on assumptions rather than solid evidence. The lack of adequate baseline data obstructs a proper evaluation of cumulative and indirect impacts, seasonal variations, and the interactions within the wider ecosystem. This adds uncertainty concerning the actual risks posed to marine species and habitats.

From a regulatory standpoint, the application does not satisfy the requirements of the Environmental Impact Assessment regime and National Planning Framework 4, as it fails to accurately identify and assess protected species. The uncertainty introduced by these deficiencies precludes the possibility of confidently excluding adverse effects, thus invoking the precautionary principle. In light of these issues, granting consent would not be lawful.

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

ORNITHOLOGY AND SEABIRD IMPACTS

The assessment of the ornithological impact is fundamentally flawed and presents significant inconsistencies and gaps in evidence that seriously undermine its findings. The development site is situated within crucial foraging areas and migratory corridors on the west coast of the Isle of Lewis, which hosts internationally significant seabird populations that are already in decline. However, the application does not adequately demonstrate that these species will not be adversely affected, failing to meet the required evidential standards.

Moreover, the application contains a fundamental contradiction; it asserts that there will be no significant adverse effects, while simultaneously proposing a Habitats Regulations derogation case, which is only necessary when significant harm is anticipated. This inconsistency raises serious doubts about the reliability of the assessment and suggests that the conclusions drawn are not underpinned by the necessary evidence.

The assessment falls short in demonstrating that seabirds associated with protected areas such as the Lewis Peatlands and St Kilda will be unaffected. The significance of these feeding grounds is inadequately considered, and the reliance on modelling techniques introduces uncertainty, particularly for species like Kittiwakes and Fulmars that are already facing severe declines. The methodologies utilised are likely to underestimate mortality rates, especially given the lack of comprehensive baseline data and an incomplete understanding of behavioural responses.

The placement of turbines within a known migratory corridor poses an additional risk, effectively creating a barrier in a primary flight path used by migratory species travelling between the United Kingdom and Iceland. The long-term implications of sustained mortality within this corridor and its potential impacts on species with limited global populations have not been adequately assessed.

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

The identified deficiencies also represent non-compliance with the National Planning Framework 4 regarding biodiversity protection and the safeguarding of natural assets. The inability to prove that internationally important seabird populations will not be adversely affected places the proposal in direct conflict with national policy.

In conclusion, the assessment lacks reliability due to its internal inconsistencies, methodological weaknesses, and insufficient evidence. These shortcomings hinder a thorough evaluation of impacts and lead to the overall determination that the application fails to meet the statutory requirements essential for its approval.

CULTURAL HERITAGE AND COMMUNITY IDENTITY

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

A significant deficiency arises from the treatment of culturally important sites such as the cemeteries at Dalmore, Bragar, and Barvas. These sites serve as active places of burial and spiritual practice, yet the assessment categorises them merely as static features, neglecting their continued use and the impact of development on their setting. This mischaracterisation leads to an incomplete evaluation of cultural effects and disregards their integral role within community life.

Moreover, the application fails to consider intangible cultural heritage, which includes the Gaelic language, traditions, and the long-standing relationship between the community and the coastal environment. These elements are central to the identity of the area but are entirely absent from the assessment, representing a significant omission. Without addressing these factors, the cultural impact of the development cannot be fully understood.

Concerns about community rights and engagement further exacerbate the situation. The Gaelic-speaking population has a distinct cultural identity recognised as characteristic of Indigenous Peoples; however, 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 affecting cultural and environmental interests.

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

From a policy standpoint, these deficiencies place the proposal in direct conflict with National Planning Framework 4, particularly concerning the protection of historic assets and places. The failure to consider both tangible and intangible heritage, alongside the neglect 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 properly assessed, leading to an application that does not provide a sufficient basis for evaluating the true cultural cost of the proposal.

SOCIAL IMPACTS, HEALTH, AND WELLBEING

The proposal under consideration lacks sufficient assessment of social impacts, health, and wellbeing, which is necessary for a lawful evaluation. Although a Social Impact Assessment was commissioned by the developer that included focus groups with local residents, the full report has not been made public. This absence creates a significant evidential gap, hindering both the public and the competent authority from grasping the full range of social risks identified by the developer's research.

Residents are reportedly already facing measurable levels of stress, anxiety, and concern due to the scale and proximity of the proposed development. These impacts are derived from direct engagement and are thus not speculative. However, without the full assessment being disclosed, it is impossible to properly scrutinise the findings or assess their significance in the decision-making process.

There is further evidence indicating that the proposal is seen as a threat to community identity and cohesion, with a notion of "cultural loss" acknowledged in the developer's findings. Despite this recognition, these impacts have not been adequately integrated into the main application nor given the appropriate consideration they warrant. The lack of access to the complete Social Impact Assessment therefore obscures the genuine human and social costs associated with the development.

This lack of transparency also undermines the Environmental Impact Assessment process, as a thorough understanding of social, economic, and health implications is vital for developments of this nature, especially when community character and functionality may be at stake. The failure to provide the complete dataset means that the application does not present a comprehensive evidential basis for weighing benefits against harm.

From a policy standpoint, the application does not show adherence to National Planning Framework 4 regarding health and wellbeing. Developments should promote positive health outcomes and avoid causing harm. Nonetheless, the evidence currently available suggests that there are existing adverse effects that have not been fully disclosed. In the absence of the complete assessment, compliance with this policy remains unproven.

The procedural implications are considerable, as the competent authority cannot carry out a thorough socio-economic and health evaluation without access to the full Social Impact Assessment. This omission constitutes a material flaw within the application and signifies a failure to meet the evidential standards outlined by the Environmental Impact Assessment regime.

Overall, the non-disclosure of the complete Social Impact Assessment, coupled with evidence of existing adverse effects, renders the assessment incomplete and unreliable. This situation prevents a lawful determination and reinforces the assertion that the application lacks sufficient information to proceed.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The proposal's assessment of visual, seascape, and landscape impacts is severely lacking, failing to capture both the extent of change and the sensitivity of the environment. The West Lewis coastline is characterised by its unspoilt Atlantic horizon, which contributes to its undeveloped nature and profound sense of remoteness. The planned installation of large-scale turbines near the shoreline would result in a continuous industrial presence that would fundamentally change this character, leading to a permanent and irreversible transformation of the landscape.

The application inadequately addresses the magnitude of visual change that would occur. Due to their scale and proximity, the turbines would overpower views from residential areas, historic sites, and popular coastal locations, thus directly affecting visual amenity and diminishing the essential qualities of naturalness and remoteness. This significant impact has not been properly conveyed, which is particularly

concerning given the sensitivity of the landscape in question.

Methodological issues are evident in the selection and presentation of visual viewpoints. There is evidence indicating that these viewpoints may not adequately reflect the most sensitive receptors or potential worst-case scenarios, especially concerning key cultural heritage sites and high-value landscapes. This raises the risk of underestimating the visual impact, thereby compromising the assessment's reliability.

Additionally, the assessment neglects to consider the interconnectedness of the landscape, seascape, and cultural heritage. Important sites like the Calanais Standing Stones and other Scheduled Monuments are linked to the broader landscape by visual and spatial relationships with the Atlantic horizon. The evaluation incorrectly treats these assets as isolated, failing to recognise their interdependence, which results in an incomplete understanding of the impacts on their setting and cultural significance.

The industrialisation of the seascape threatens to sever these vital connections, altering the context in which heritage assets are experienced and disrupting their relationship to the natural horizon. This signifies not only a visual impact but also a broader cultural and spatial detriment that has not been thoroughly assessed within the application.

From a policy standpoint, the proposal directly contravenes the National Planning Framework 4 regarding the safeguarding of natural places and historic assets. The anticipated scale of change is incompatible with the mandate to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a comprehensive worst-case scenario assessment further weakens any assertions of policy compliance.

Moreover, it is evident that the impacts outlined cannot be effectively mitigated. The scale, height, and proximity of the turbines would ensure their presence remains dominant and unavoidable. Therefore, the resulting change would be fundamental and permanent, incapable of being reduced to an acceptable level through mitigation efforts.

In conclusion, the assessment is inadequate in representing the scale of impact, the sensitivity of the environment, and the interconnected nature of landscape and heritage. These deficiencies hinder a reliable evaluation and reinforce the position that the proposal is incompatible with the preservation of this landscape.

CONSTRUCTION AND POLLUTION RISKS

The assessment of construction and pollution risks is markedly deficient and lacks the necessary detail to properly evaluate potential environmental effects. The proposed activities entail significant seabed preparation and installation operations within a high-energy Atlantic environment, yet there are no well-developed Construction Environmental Management Plans or Pollution Prevention Plans. Instead, the application relies on future mitigation and contingency measures that will be

established after consent, which hinders any substantial assessment of their adequacy or effectiveness.

This dependence on unspecified future measures is especially troubling given the sensitivity of the surrounding environment. The West Lewis coastline is home to clean coastal waters and critical habitats that are susceptible to sediment disturbance and contamination. While the application acknowledges risks such as sediment mobilisation and the possibility of accidental chemical or oil spills, it fails to provide adequate detail on how these risks will be prevented, managed, or monitored.

There is also ambiguity surrounding the scale and behaviour of sediment plumes that could result from seabed disruption and cable installation. Without comprehensive modelling and clearly defined management strategies, it is impossible to ascertain the extent, duration, or ecological implications of these disturbances. This uncertainty extends to the potential effects on marine species and habitats that have already been identified as sensitive in the broader assessment.

Compounding these issues is the absence of detailed emergency response procedures. By postponing contingency planning until after consent is granted, the application prevents any evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces a procedural risk and undermines the ability of the competent authority to assess environmental protection measures effectively at the determination stage.

From a regulatory standpoint, the delay in implementing critical environmental safeguards contradicts the stipulations of the Environmental Impact Assessment regime. It is essential that likely significant effects and mitigation are evaluated prior to consent; without this information, a lawful determination cannot be achieved. Furthermore, the application does not demonstrate adherence to policy requirements concerning environmental protection and water quality.

Ultimately, the lack of defined mitigation measures, the absence of comprehensive management plans, and the uncertainty regarding potential impacts lead to a materially deficient assessment. These shortcomings hinder a thorough evaluation of construction and pollution risks and further substantiate the conclusion that the application is incomplete.

FISHERIES AND MARINE LIFE

The assessment presented regarding fisheries and marine life is fundamentally inadequate, lacking a thorough evaluation of both ecological and socio-economic impacts. Off the West Lewis coast, there exists a rich marine ecosystem alongside a thriving fishing industry. However, the application does not provide assurances that these vital uses and habitats can be preserved or maintained without experiencing significant disruption.

A key concern arises from the assumption that fishing activities can be relocated

without negative consequences. The application fails to furnish any evidence supporting the availability or accessibility of alternative fishing grounds that could accommodate additional pressure. This significant gap in information raises the risk of overfishing in other areas and could lead to broader economic repercussions for the local fishing fleet. In the absence of a clear, evidence-based assessment, the potential impacts on fisheries and livelihoods remain poorly understood.

Additionally, the proposal poses considerable risks to marine species, primarily due to the underwater noise generated during construction. The anticipated high-energy hammer piling over extended durations is likely to disturb marine life across extensive distances, notably affecting species such as dolphins. The projected disturbance to a considerable portion of the local bottlenose dolphin population is particularly concerning, yet the application minimises the significance of these impacts without adequate supporting evidence.

There is a notable inconsistency within the application itself, where the necessity for licenses to permit harm to European Protected Species is acknowledged, while simultaneously describing impacts as negligible. This contradiction casts doubt on the assessment's credibility and raises issues regarding compliance with the Habitats Regulations, especially when harm is expected at levels necessitating legal authorisation.

Furthermore, the assessment neglects to address cumulative impacts that may arise from various pressures, including habitat disturbance, noise pollution, and the displacement of fishing activities. Without a comprehensive analysis of these interrelated effects, it is impossible to ascertain the overall impact on marine ecosystems and the socio-economic conditions surrounding them.

From a policy standpoint, the application fails to demonstrate adherence to the National Planning Framework 4 or the National Marine Plan. It does not establish that the proposed development can coexist with existing marine users or prevent unacceptable impacts on marine biodiversity, thus obstructing any conclusions that the project can be considered sustainable.

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

ONSHORE INFRASTRUCTURE : HIDDEN IMPACTS

The application raises substantial concerns regarding the integrity of its assessment, particularly in relation to the onshore infrastructure, which remains materially incomplete. This approach treats the offshore turbines and onshore works as separate entities, which obscures the full scope of the environmental and socio-economic effects associated with what is fundamentally a single integrated project.

One of the critical components of the onshore works involves the routing of cabling across protected moorland and the construction of a substation in proximity to Stornoway. This activity necessitates excavation across areas rich in deep peat, notably within Barvas Moor, an ecologically sensitive habitat that serves as a significant carbon store. However, the application fails to provide a thorough assessment of these impacts, thereby inhibiting a complete understanding of the project's environmental footprint.

The omission or postponement of onshore impact assessments results in an inability to accurately evaluate cumulative effects. The Environmental Impact Assessment process mandates that all project components be assessed together; yet, the current separation of offshore and onshore elements means that the combined impacts on peatlands, habitats, and local communities remain inadequately understood.

Moreover, there are notable risks posed to sensitive habitats, including machair systems and peatland environments, which receive policy protection. The application does not sufficiently demonstrate that the impacts on these habitats have been thoroughly evaluated or that appropriate avoidance measures have been implemented. This deficiency signifies a significant evidential gap in terms of biodiversity protection.

The proposal also raises important issues related to carbon balance. The disturbance of peatland can lead to the release of stored carbon, potentially creating a carbon debt that contradicts the fundamental goals of renewable energy development. The application does not sufficiently address this concern or prove that the overall carbon balance remains advantageous.

Additionally, the routing of infrastructure through active croft land presents potential conflicts with existing land use and legal rights. The application lacks evidence that the necessary consents or processes have been initiated, which raises doubts about the project's deliverability and lawful implementation.

From a policy perspective, the failure to assess the project comprehensively 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 compromises the integrity of the application.

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

DARK SKIES AND NOCTURNAL WILDLIFE

The lack of assessment regarding dark skies and nocturnal wildlife is a significant oversight within the Environmental Impact Assessment. The coastline of West Lewis is renowned for its exceptionally dark skies, which are vital to the area's environmental

quality, cultural identity, and tourism potential. The proposed introduction of permanent red aviation lighting will be visible over extensive distances, resulting in a continuous and intrusive “wall of light” that will drastically change the night-time environment.

Furthermore, the proposal fails to consider how this lighting will impact visual amenity, landscape character, and the experiences of both residents and visitors. This is particularly concerning given the importance of dark skies to the area’s identity and the emerging sector of astro-tourism. Such a significant omission creates a clear deficiency in the overall landscape and environmental assessment.

Equally important is the lack of evaluation regarding the effects of this artificial lighting on nocturnal wildlife. Various species, including Manx Shearwater, European Storm Petrel, and Leach’s Storm Petrel, exhibit sensitivity to artificial light due to phototaxis, which can lead to disorientation and a heightened risk of collisions. The application does not feature a lighting impact assessment or a phototaxis study, meaning that the potential effects of aviation lighting on these species or the likelihood of increased mortality have not been evaluated.

This concern is further exacerbated by the reliance on daytime survey data in the ornithological assessment, which overlooks nocturnal activity and the associated risks. Other species, such as Kittiwakes, which may forage or migrate at night, are also at risk of disorientation due to artificial lighting, but this has not been assessed. The absence of site-specific night-time data leaves a crucial gap in understanding the ecological impacts of the proposal.

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

From a policy standpoint, these omissions conflict with National Planning Framework 4 regarding the safeguarding of natural places and environmental quality. They also undermine the overall assessment of landscape and seascape impacts, as the character of the night-time environment is a fundamental aspect of the ecosystem.

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

SUMMARY

The proposal for the Spiorad na Mara Offshore Wind Farm fundamentally fails to meet the criteria for sustainable development when evaluated against statutory duties, national policy, and evidential standards. This application echoes the critical issues

that prompted the refusal of the Lewis Wind Power proposal in 2008, wherein the scale of industrialisation was deemed unacceptable. Despite being presented within a more robust policy context, which prioritises biodiversity, peatland protection, landscape integrity, and community wellbeing, the application remains deficient.

A thorough evidential basis for determination is lacking. There are significant gaps in baseline data and an undefined design envelope, alongside an over-reliance on unspecified mitigation measures. Key impact pathways, such as those affecting nocturnal wildlife, comprehensive onshore infrastructure, and tourism effects, are notably omitted. Consequently, the Environmental Impact Assessment is inadequate, failing to facilitate a complete understanding of the likely significant effects and residual impacts.

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

Moreover, the proposal is at odds with National Planning Framework 4. It does not demonstrate adequate protection for biodiversity, natural habitats, and cultural heritage, fails to validate that health and wellbeing impacts are acceptable, and lacks evidence of a net economic benefit due to the absence of tourism impact modelling. The cumulative effects of both offshore and onshore components have not been sufficiently assessed, thereby obscuring the potential impacts on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. Incomplete assessments of marine ecology, seabirds, protected species, and marine mammals, in some instances, lack internal consistency. The evidential threshold necessary to rule out adverse effects beyond reasonable scientific doubt has not been achieved, which engages the precautionary principle and inhibits a lawful conclusion regarding the acceptability of impacts.

Furthermore, the proposal is poised to cause substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the implications for tourism signify permanent effects that cannot be adequately mitigated.

In summary, the application is both procedurally and substantively unfit for determination. The magnitude of information deficiencies, paired with policy conflicts and unresolved environmental risks, obstructs a lawful, evidence-based decision. The competent authority should refuse consent on these grounds or invoke the appropriate regulatory provisions to mandate the submission of the necessary information.

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

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: 1E3B2CDE

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

Dear Sir/Madam

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

A critical review of the Environmental Impact Assessment Report and supporting documentation reveals significant deficiencies. The application lacks an adequate evidential basis for a lawful determination, with essential environmental data absent, baseline information limited and inconsistent, and key aspects of the proposal left undefined. The reliance on a flexible design framework hinders a clear understanding of likely significant effects, and without specified mitigation measures, their effectiveness remains unassessed. Consequently, the documentation fails to provide a comprehensive understanding of environmental, cultural, or community impacts, with assertions of negligible or non-significant effects lacking robust evidential support.

Furthermore, the proposal exhibits clear and substantive policy conflicts. It appears inconsistent with the National Marine Plan, the Environmental Impact Assessment regime, and National Planning Framework 4, particularly concerning biodiversity, natural places, cultural heritage, and health and wellbeing. The application does not demonstrate compliance with national requirements to protect biodiversity, climate interests, and environmental integrity. Such conflicts are directly relevant to the statutory tests needed for consent and compromise the competent authority's ability to deem the development acceptable in policy terms.

The unprecedented scale of the proposal raises serious concerns, particularly with large turbines positioned in close proximity to the shoreline, leading to significant implications for landscape capacity, visual dominance, and environmental impact. The combination of insufficient information, undefined mitigation measures, evidential weaknesses, and clear policy non-compliance illustrates that the application is incomplete and unable to support a lawful determination. In light of these factors, the precautionary principle must be invoked.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of the visual, landscape, and seascape impacts presented in the application is significantly lacking and does not accurately reflect the extent of change or the sensitivity of the surrounding environment. The West Lewis coastline is

characterised by its unspoilt Atlantic horizon and a profound sense of remoteness. The placement of large-scale turbines near the shoreline would create a persistent and overwhelming industrial presence, fundamentally changing this character and leading to a permanent transformation of the landscape that cannot be undone.

Furthermore, the application fails to adequately demonstrate the magnitude of visual change that would result. The scale and close proximity of the turbines would overshadow views from residential areas, historic sites, and popular coastal locations, directly affecting visual amenity and diminishing the naturalness and remoteness that define the area. The assessment does not convincingly convey the significance of this impact within the context of such a delicate landscape.

Methodological issues also arise concerning the choice and presentation of visual viewpoints. Evidence indicates that the selected viewpoints may not sufficiently represent the most sensitive receptors or the worst-case scenarios, particularly concerning important cultural heritage sites and landscapes of high value. This raises concerns about the potential understatement of visual impact, which compromises the overall reliability of the assessment.

Additionally, there is a notable failure to evaluate the interconnected relationship between the landscape, seascape, and cultural heritage. Notable 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. Instead of recognising their interdependence, the assessment treats these sites as isolated, leading to an incomplete understanding of the impacts on their setting and cultural significance.

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

From a policy standpoint, the proposal is in direct conflict with National Planning Framework 4 regarding the preservation of natural environments and historic assets. The scale of the proposed changes is incompatible with the obligation to protect landscape character, visual amenity, and the settings of culturally significant sites. The lack of a thorough worst-case assessment further undermines any assertion of compliance with policy guidelines.

It is evident that the identified impacts cannot be effectively mitigated. Given the size, height, and proximity of the turbines, their presence would be unavoidable and dominating. As a result, the change is fundamental and permanent, rather than something that could be reduced to an acceptable level through mitigation measures.

Collectively, these shortcomings in the assessment prevent an accurate representation of the impact scale, the environment's sensitivity, and the interconnectedness of

landscape and heritage. Such 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 proposal lacks a comprehensive assessment of construction and pollution risks, which is essential for understanding the environmental effects. It involves considerable seabed preparation and installation works in a high-energy Atlantic environment, yet there are no fully developed Construction Environmental Management Plans or Pollution Prevention Plans included. Instead, the application suggests that mitigation and contingency measures will be created after consent is granted. This approach prevents a proper assessment of their sufficiency or effectiveness.

There are significant concerns about relying on undefined measures, especially considering the delicate nature of the receiving environment. The West Lewis coastline is home to clean coastal waters and vital habitats that are at risk from sediment disturbance and contamination. Although the application notes risks such as sediment mobilisation and potential chemical or oil spills, it does not provide adequate information on how to prevent, control, or monitor these issues.

Uncertainty remains regarding the scale and behaviour of sediment plumes resulting from seabed disturbance and cable installation. Without thorough modelling and clear management strategies, it is impossible to ascertain the extent, duration, or ecological effects of these impacts. This uncertainty also applies to potential consequences for sensitive marine species and habitats highlighted in the broader assessment.

Moreover, the lack of detailed emergency response procedures heightens these concerns. By postponing contingency planning until after consent, the application hinders the evaluation of whether suitable safeguards are in place to address pollution incidents. This introduces procedural risks and diminishes the ability of the competent authority to review environmental protection measures before making a decision.

From a regulatory standpoint, postponing essential environmental safeguards contradicts the requirements set out in the Environmental Impact Assessment regime. Significant effects and mitigation must be assessed prior to granting consent, and without this information, a lawful determination cannot be achieved. Additionally, the application does not prove compliance with policy requirements concerning environmental protection and water quality.

In summary, the lack of defined mitigation measures, inadequate management plans, and uncertainty about potential impacts result in a materially deficient assessment. These issues obstruct a thorough evaluation of construction and pollution risks, further indicating that the application is incomplete.

SUMMARY

The Spiorad na Mara Offshore Wind Farm proposal represents a significant failure to meet the standards of sustainable development as outlined by statutory obligations, national policy, and evidential benchmarks. This application echoes the fundamental issues that resulted in the refusal of the Lewis Wind Power proposal in 2008, where the scale of industrialisation was deemed unacceptable. Currently, it is presented within a stronger policy framework that emphasises the importance of biodiversity, peatland preservation, landscape integrity, and community wellbeing.

A reliable evidential basis for this application is lacking. It contains critical gaps in baseline data, continues to utilise an undefined design envelope, relies on unspecified mitigation measures, and omits essential impact pathways such as those affecting nocturnal wildlife, full onshore infrastructure, and tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a thorough understanding of significant effects or residual impacts.

Additionally, there are evident procedural shortcomings. The lack of a compliant Island Communities Impact Assessment constitutes a violation of the statutory requirements under the Islands (Scotland) Act 2018. Moreover, the failure to provide the complete Social Impact Assessment represents a significant omission. These shortcomings prevent the competent authority from adequately evaluating 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 fails to demonstrate adequate protection of biodiversity, natural places, and cultural heritage. Furthermore, it does not provide evidence that health and wellbeing impacts are acceptable, nor does it show a net economic benefit due to the lack of tourism impact modelling. The assessment of cumulative impacts from both offshore and onshore components has been insufficient, obscuring effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with the proposal remain uncertain and potentially significant. The evaluations of marine ecology, seabirds, protected species, and marine mammals are incomplete and, in some cases, inconsistent. The evidential threshold necessary to dismiss adverse effects beyond reasonable scientific doubt has not been met, which engages the precautionary principle and inhibits a lawful conclusion that impacts are acceptable.

Furthermore, the proposal would lead to substantial and irreversible alterations to a highly sensitive landscape. The industrialisation of the Atlantic-facing coastline, the loss of dark skies, the disruption of cultural and visual relationships, and the negative 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 extensive information deficiencies, alongside policy conflicts and unresolved environmental risks, obstruct a lawful and evidence-based decision.

Therefore, the competent authority must either refuse consent on these grounds or invoke the necessary regulatory provisions to require the submission of the missing information.

For these reasons, 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: F5F751B5

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

Dear Sir/Madam

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

The application lacks a sufficient 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. Furthermore, key aspects of the proposal remain undefined. The flexible design framework inhibits a clear understanding of the likely significant effects, and the reliance on unspecified mitigation measures means their effectiveness cannot be evaluated. Consequently, the documentation fails to furnish a complete or informed understanding of the environmental, cultural, or community impacts, and claims regarding negligible or non-significant effects lack robust supporting 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, especially concerning biodiversity, natural places, cultural heritage, and health and wellbeing. It does not adequately demonstrate compliance with national requirements aimed at protecting biodiversity, climate interests, and environmental integrity. These policy conflicts directly challenge the statutory tests needed for consent and hinder the competent authority's ability to determine the acceptability of the development from a policy perspective.

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

ASSESSMENT OF ALTERNATIVES

The proposed development suffers from a materially inadequate assessment of alternatives, failing to meet the statutory requirements of the Environmental Impact Assessment regime. Instead of delivering a structured and reasoned comparison of realistic alternatives based on environmental effects, the application offers a narrative of the project's evolution. This method does not demonstrate that less harmful options have been properly identified, assessed, and chosen over more damaging solutions.

Moreover, there is a distinct lack of transparent and evidence-based comparisons regarding alternative offshore locations, development scales, or design configurations. The application notably does not indicate that the developer has genuinely explored the possibility of placing turbines further offshore, where the potential for reduced visual, ecological, and coastal impacts would exist. Given the sensitivity of the West Lewis coastline and the critical significance of proximity to shore in determining impact, the absence of such analysis precludes any assertion that the proposed siting is the least damaging option available.

The inadequacies further extend to the assessment of cable routing and landfall, where there is insufficient evidence that alternative routes have been properly examined to avoid or minimise impacts on sensitive receptors. This includes areas of cultural and spiritual significance, such as Barvas Cemetery. The lack of a clear avoidance strategy and the absence of comparative analysis point to a failure to apply mitigation by design, resulting in a reliance on post-design mitigation measures instead.

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

From a policy standpoint, this shortcoming undermines 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 contributes to the overarching conclusion that the application has not been adequately evaluated and cannot support a lawful determination.

SEASCAPE, LANDSCAPE, AND VISUAL IMPACTS

The assessment of visual impacts, landscape, and seascape is significantly lacking, failing to accurately capture the extent of change and the sensitivity of the surrounding environment. The coastline of West Lewis is characterised by its open Atlantic horizon and its undeveloped nature, which contributes to a strong sense of remoteness. The planned large-scale turbines, situated close to the shoreline, would impose a continuous industrial presence, fundamentally altering this unique character and leading to a permanent transformation of the landscape.

The visual change represented in the application is not sufficiently detailed. Given the scale and proximity of the turbines, they are likely to dominate views from residential areas, historic locations, and popular coastal sites. This dominance would adversely affect visual amenity and compromise the essential qualities of naturalness and remoteness. The assessment does not effectively communicate the significance of this impact within the context of such a sensitive landscape.

Concerns arise regarding the methodology used in selecting and presenting visual viewpoints. Evidence indicates that the chosen viewpoints may not adequately represent the most sensitive receptors or the worst-case scenarios, especially concerning significant cultural heritage sites and high-value landscapes. This limitation raises the possibility that the visual impact has been understated, thus questioning the reliability of the assessment.

Additionally, the assessment neglects to explore the interconnectedness of landscape, seascape, and cultural heritage adequately. Iconic sites such as the Calanais Standing Stones and other Scheduled Monuments are intrinsically linked to the wider landscape, sharing visual and spatial connections to the Atlantic horizon. The assessment fails to consider these sites as interdependent assets, leading to an incomplete evaluation of the impacts on their cultural significance and setting.

The industrialisation of the seascape threatens to sever these vital connections, transforming the context in which heritage assets are perceived and disrupting their relationship with the natural horizon. This issue is not limited to visual impacts but also encompasses broader cultural and spatial damages, which the application has not properly addressed.

From a policy standpoint, the proposal is at odds with National Planning Framework 4, which aims to protect natural spaces and historic assets. The proposed scale of change contradicts the need to preserve landscape character, visual amenity, and the settings of culturally significant sites. Moreover, the lack of a comprehensive worst-case assessment further challenges any claims of policy adherence.

Ultimately, the impacts identified are not capable of being effectively mitigated. Due to the turbines' scale, height, and proximity, their presence will be dominant and unavoidable. Therefore, the resulting changes are fundamental and permanent, beyond the possibility of being lessened to acceptable levels through mitigation efforts.

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

SUMMARY

The application for the Spiorad na Mara Offshore Wind Farm is fundamentally flawed and fails to meet the standards required for sustainable development, as assessed

against statutory duties, national policy, and evidential criteria. It mirrors the issues that resulted in the rejection of the Lewis Wind Power proposal in 2008, which was deemed unacceptable due to the scale of industrialisation. Despite being presented under a more robust policy framework that prioritises biodiversity, peatland conservation, landscape integrity, and community wellbeing, the application lacks a reliable evidential foundation for its determination.

Critical deficiencies exist in the baseline data provided, and the reliance on an undefined design envelope raises significant concerns. Furthermore, the proposal does not adequately specify its mitigation measures and neglects key impact pathways such as nocturnal wildlife, the implications of the full onshore infrastructure, and the effects on tourism. Consequently, the Environmental Impact Assessment is incomplete, hindering a comprehensive understanding of the likely significant effects and residual impacts of the project.

Additionally, there are clear procedural violations evident in the application. The lack of a compliant Island Communities Impact Assessment breaches statutory duties outlined in the Islands (Scotland) Act 2018. Moreover, the failure to fully disclose the Social Impact Assessment is a critical omission. These shortcomings hinder the competent authority's ability to evaluate impacts on community wellbeing, cultural identity, and economic resilience, rendering the application unfit for determination.

The proposal stands in direct contradiction to National Planning Framework 4. It does not adequately demonstrate the protection of biodiversity, natural landscapes, and cultural heritage, nor does it provide evidence that health and wellbeing impacts are acceptable. There is also a failure to show a net economic benefit, largely due to the lack of modelling regarding tourism impacts. The cumulative impacts of both offshore and onshore elements have not been thoroughly assessed, which obscures the potential effects on peatlands, carbon balance, habitats, and crofting land.

Environmental risks associated with this proposal remain uncertain and may be significant. The assessments concerning marine ecology, seabirds, protected species, and marine mammals are incomplete and, at times, inconsistent. The evidential threshold needed to demonstrate that adverse effects can be excluded beyond reasonable scientific doubt has not been achieved. This situation engages the precautionary principle, preventing any lawful conclusion that impacts are acceptable.

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

In summary, the application is both procedurally and substantively unsuitable for determination. The extent of information deficiencies, coupled with policy conflicts and unresolved environmental risks, precludes a lawful and evidence-based decision. The competent authority must refuse consent based on these grounds or enforce the

relevant regulatory provisions to compel the submission of the missing information.

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

Additional Comments

The detrimental visual impact of this development is significant due to it's proposed location.

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: 5E28DC70

